

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

JASON GOODMAN,

Counter Plaintiff,

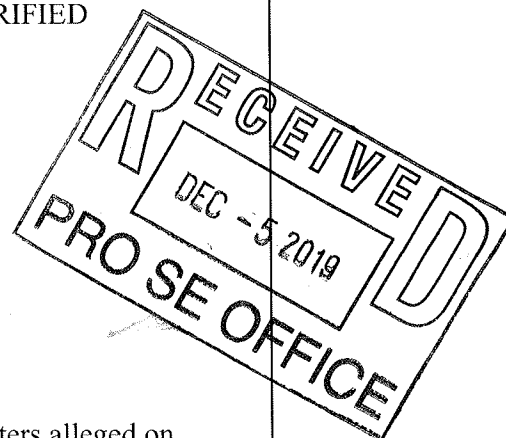
vs.

D. GEORGE SWEIGERT,

Counter Defendant

Case No.: 1:18-cv-08653-VEC-SDA

COUNTER CLAIM VERIFIED  
COMPLAINT



**COUNTER CLAIM VERIFIED COMPLAINT**

Statement and Verification

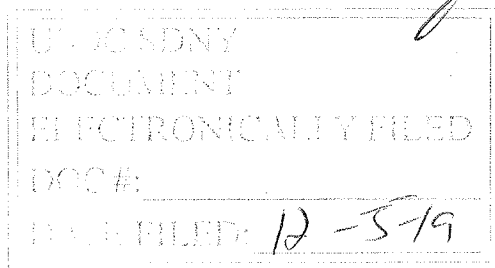
This pleading is true to the knowledge of the undersigned, except as to matters alleged on information and belief, and that as to matters the undersigned believes to be true. See N.Y.

C.P.L.R. 3020

Signed this 29<sup>th</sup> day of November 2019 under penalty of perjury

A handwritten signature in black ink, appearing to be "J. Goodman", written over a horizontal line.

Jason Goodman, Defendant, Pro Se  
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**TABLE OF AUTHORITIES**

**CASES**

*SDNY Sweigert v Goodman (1:18-cv-08653-VEC-SDA)* ..... 4

*Steele v Goodman (3:17-cv-00601-MHL)* ..... 9

*Sepenuk v. Case 1:15-cv-04244-JGK* ..... 16

Marshall, No. 98-cv-1569 (RCC), 2000 WL 1808977, at (S.D.N.Y.Dec. 8, 2000)..... 16

World Wrestling Fed’n Entm’t, Inc. v. Bozell, 142 F. Supp. 2d 514, 532 (S.D.N.Y. 2001). ..... 16

Pittman by Pittman v. Grayson, 149 F.3d 111, 123 (2d Cir. 1998) ..... 16

Rastelli v. Goodyear Tire & Rubber Co., 591 N.E.2d 222, 224 (N.Y. 1992). .....16

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**STATUTES**

40 N.Y. Con. Laws Ann. § 240.30 ..... *passim*  
28 USC § 1332 (a)(1)..... 10

**RULES**

FRE Rule 804 (b)(3)(A) and (B)..... 3,5

## COMPLAINT

Counter Plaintiff, Jason Goodman, (hereinafter "Goodman"), for his Complaint against Counter Defendant, D. George Sweigert (hereinafter "Sweigert") avers upon personal knowledge as to his own acts and status and upon information and belief and to all other matters.

### NATURE OF THE ACTION

1. This Complaint arises out of Counter Defendant Sweigert's defamatory statements, false accusations, deceptive actions, menacing, cyberstalking, harassment and deliberate acts of tortious interference carried out against Counter Plaintiff Goodman from June 2017 continuously through to today.
2. Sweigert became an active member of a conspiracy, entering into an agreement with Tyroan Simpson (hereinafter "Simpson") to take action against Goodman for which Simpson indicated Sweigert would be paid. Sweigert and others then proceeded to commit numerous overt acts in furtherance of the conspiracy.
3. Sweigert worked in concert with others to defame, harass and stalk Goodman both online and in the real world. Sweigert engaged in a series of overt acts including encouraging others to commit overt acts in furtherance of the conspiracy to defame, harass and commit tortious interference against Goodman.
4. On or around April 2017, Counter Plaintiff Goodman began a collaborative working relationship with George Webb Sweigert (hereinafter "Webb") the brother of Counter Defendant Sweigert. Goodman and Webb cooperated in creating news broadcasts and political commentary videos on YouTube, Facebook and other public social media sites on the internet.



- 1 5. No official business relationship exists or has ever existed between Goodman and  
2 Webb. No written or verbal agreement exists or has ever existed between Goodman  
3 and Webb.
- 4 6. Almost immediately after the Goodman / Webb collaboration began, counter  
5 Defendant Sweigert responded with harassment in the form of a public social media  
6 smear campaign, creating his own YouTube broadcasts and other social media posts  
7 deliberately defaming Counter Plaintiff Goodman and interfering with Counter  
8 Plaintiff's business associates and colleagues directly and in an ongoing manner.
- 9 7. Sweigert and his co-conspirators have targeted and harassed nearly all of Goodman's  
10 talk show guests, in some cases succeeding at discouraging those guests from  
11 returning to Goodman's program, satisfying Sweigert's goal and fulfilling his acts of  
12 tortious interference.
- 13 8. In December 2017, Sweigert entered into a verbal agreement with Simpson and other  
14 third parties during a multiparty telephone call with Simpson, Manuel Chavez III aka  
15 "Defango" (hereinafter "Chavez"), Nathan Stolpman aka LTV aka Lift the Veil  
16 (hereinafter "Stolpman"), an unknown individual using the false name Hoax Wars  
17 (hereinafter "Hoax Wars") and possibly other unknown individuals. **(EXHIBIT A)**  
18 This hearsay video recording of the phone call and the included transcript should be  
19 excluded under FRE Rule 804 (b)(3)(A) and (B) as it contains statements against the  
20 declarants' interests and, corroborating circumstances have indicated the  
21 trustworthiness of the information it conveys. During the call, Simpson suggests the  
22 social media network Steemit.com as the "*best way to get JG*" referring to Counter  
23 Plaintiff Jason Goodman. Immediately after this statement, Sweigert speaks about a  
24  
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1       “unified effort”. Sweigert volunteers to conduct a letter writing and public  
2       defamation and harassment campaign against Goodman. Sweigert insists  
3       “everybody's got to find their part in this and do their part that's it.” In reference to  
4       Counter Plaintiff with regard to his harassing letter writing campaign, Sweigert  
5       openly admits “I'm writing that shit all the time behind the scenes on Jason” to  
6       which Simpson responds “I can get you paid for it in a way that's not connected to  
7       the government at all”. Sweigert agrees, responding to Simpson’s offer “Alright, ok  
8       we can do that.” Sweigert goes on to clearly state “I volunteer to be the liaison to  
9       fuck with these guys through government processes through military processes  
10       through law enforcement processes.” This is an open admission of his eagerness to  
11       violate 40 N.Y. Con. Laws Ann. § 240.30 Aggravated harassment in the second  
12       degree, and his commitment to doing so is shown by his overt actions over the  
13       months that followed.  
14

15  
16       9. During the multiparty call, Sweigert makes numerous direct references to the  
17       conspiracy stating among other things, “everybody's got to find their part in this and  
18       do their part” imploring his co-conspirators to act against Goodman.  
19

20       10. Since December 2017 Sweigert has taken deliberate steps in coordination with others,  
21       including but not limited to Simpson, Chavez and Stolpman and engaged in overt acts  
22       in furtherance of the promised defamation and harassment he agreed to on the  
23       multiparty call.  
24

25       11. The legal action in SDNY Sweigert v Goodman (1:18-cv-08653-VEC-SDA) is only  
26       one component of Counter Defendant’s defamation and harassment against  
27       Goodman. Sweigert’s limited but marginally functional knowledge of the law  
28

1 enables him to utilize the civil justice system as a weapon. Wielding it awkwardly as  
2 he does, Sweigert appears to be aware that many of his false statements and  
3 defamatory actions could result in civil claims against him were they simply stated in  
4 a written or spoken utterance. Therefore, he uses the Federal Rules of Civil  
5 Procedure not just as a sword, but also a shield, hiding behind the absolute immunity  
6 of ostensibly legitimate legal actions, Sweigert freely makes false and defamatory  
7 claims in civil pleadings and then publicizes the content of those pleadings  
8 throughout the internet as “news”.  
9

10 12. During the December 2017 multiparty call, Sweigert specifically referenced utilizing  
11 the civil justice system as a weapon against Counter Plaintiff.  
12

13 13. In a voice mail message left by Simpson for Counter Plaintiff Goodman, Simpson  
14 threatens “*guys like Defango [reference to Chavez] and myself and about 50 other*  
15 *people that really know how to do this shit are gonna make it a lot more difficult for*  
16 *you to do really about anything just because we're gonna make you famous for the*  
17 *stupid cocksucking idiot that you are so I hope that you play this for your friends and*  
18 *we can either talk or you can just go ahead and see what we're gonna do so good luck*  
19 *to ya butthead.*” This voice mail message is a direct violation of 40 N.Y. Con. Laws  
20 Ann. § 240.30 Aggravated harassment in the second degree.  
21

22 14. Simpson’s choice to deliberately record this threatening voice mail message  
23 represents an overt act in furtherance of the conspiracy to interfere with Goodman’s  
24 business and an admission to the planned defamation and harassment to be executed  
25 by Simpson and as many as 50 (fifty) co-conspirators according to the threat. This  
26 hearsay admission should be excluded under FRE Rule 804 (b)(3)(A) and (B) because  
27  
28

1 it contains statements against the declarants' interests and, corroborating  
2 circumstances have indicated the trustworthiness of the information it conveys.

3 15. Through his interactions and communications with surrogates, co-conspirators and /  
4 or intermediaries including his own brother Webb, Chavez and Simpson, Sweigert  
5 has aligned his efforts with those of the Plaintiff in Steele v Goodman a federal  
6 lawsuit currently active in the Eastern District of Virginia (3:17-cv-00601-MHL).  
7 Webb, Chavez and Simpson have each communicated directly with Steele on  
8 multiple occasions. Chavez claims Simpson is the brother in law of Steele's attorney,  
9 Biss. Sweigert attempted to intervene in Steele v. Goodman but was denied by the  
10 honorable M. Hannah Lauck. **(EXHIBIT B)**  
11

12  
13 16. Steele has openly discussed his plans to overwhelm perceived enemies with civil  
14 legal action in multiple public YouTube broadcasts and his own blog posts.

15 17. On November 27, 2019 a Motion to disqualify counsel for Plaintiff for unethical  
16 conduct was filed in Steele v. Goodman (3:17-cv-00601-MHL). No ruling on the  
17 issue has been made as yet, however the pleading alleges conspiracy between  
18 Plaintiff, his attorney, his attorney's wife, Chavez, Sweigert and others named in this  
19 counterclaim complaint. **(EXHIBIT C)**  
20

21 18. Sweigert has made numerous false statements and false accusations against Counter  
22 Plaintiff in furtherance of the conspiracy, including contacting law enforcement  
23 around the country and providing false statements intended to put Counter Plaintiff in  
24 jeopardy of criminal charges. One such contact was to the U.S. Coast Guard New  
25 York Sector Captain Jason Tama **(EXHIBIT D)**  
26  
27  
28

1 19. The information conveyed to the Coast Guard in the letter to Captain Tama is false.

2 The letter was sent with actual malice and deliberate intent to harass and defame  
3 Goodman. Mailing this letter to Captain Tama was another overt act on the part of  
4 Counter Defendant in furtherance of the conspiracy agreed to during the multiparty  
5 call of December 2017.  
6

7 20. Sweigert continues to make false public statements and false accusations nearly daily  
8 on a newly launched blog which focuses primarily on Goodman or events and  
9 individuals Sweigert seeks to link to Goodman in furtherance of his ongoing  
10 defamation per se effort. Originally located at <http://checkmatek2.net>, Sweigert has  
11 relocated his blog to <https://sdny.news/>. By using the .news top level domain,  
12 Sweigert attempts to pass off his false and defamatory statements as legitimate  
13 “news” to unsuspecting readers.  
14

15 21. Counter Plaintiff asks the court to take notice of Sweigert’s frequent changing of  
16 names and urls for his blogs, repeated changing of mailing addresses associated with  
17 this and other legal actions in the past two years and his habitual removal of public  
18 internet posts. It is Counter Plaintiff’s belief the Sweigert’s knowledge of the Federal  
19 Rules of Civil Procedure and the Federal Rules of Evidence cause him to do this in an  
20 effort to avoid disclosing information during discovery. While Goodman’s process is  
21 open, honest and unwavering, Sweigert relies on deception, hiding information and  
22 frequent changes of names, addresses and tactics to confuse others and complicate  
23 civil litigation related to the information.  
24  
25  
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1 22. Sweigert is in a regular practice of deleting, destroying, hiding or otherwise removing  
2 public access to recordings or records of his false and defamatory statements against  
3 Goodman.

4 23. It is Counter Plaintiff's belief that Sweigert uses social media and blog posts as a  
5 form of "call and response" type communication. Once his message is received by  
6 the parties it is intended for, the message is removed, the evidence spoliated and  
7 Sweigert's standard position is to challenge the authenticity of any presentation of the  
8 material.  
9

10 24. Sweigert claims to be a former U.S. Air Force radio specialist with particular  
11 expertise in communications and information technology. Irrespective of the truth or  
12 falsehood of this claim, Sweigert utilizes military, intelligence and other sophisticated  
13 deceptive tactics to communicate with an active and dynamic network of co-  
14 conspirators who have themselves engaged in overt acts in furtherance of the  
15 conspiracy. This is done while deliberately creating the illusion that these co-  
16 conspirators are independent operators. Through the use of clandestine  
17 communications and compartmentalization of actions some co-conspirators may not  
18 be aware of the full scope of the conspiracy, but rather as Sweigert stated during the  
19 multiparty call of December 2017 *"everybody's got to find their part in this and do*  
20 *their part that's it."* It is highly likely that many of the co-conspirators are unaware  
21 of the scope of the operation or the full extent to which other parties are involved.  
22

23 25. Sweigert's overt actions in spoliating evidence and removal of public social media  
24 posts or communications is intended to complicate civil litigation and to frustrate  
25 Goodman's attempts to counteract Sweigert's devious and damaging actions.  
26  
27  
28

1 26. Counter Defendant Sweigert has worked with, conspired with, cooperated with or  
2 otherwise aligned his goals and actions with co-conspirators involved in Steele v  
3 Goodman in furtherance of their common objective to disrupt Counter Plaintiff  
4 Goodman, destroy his business and worldwide reputation and chill his journalistic  
5 efforts through persistent harassment and public defamation via any means available  
6 to them.  
7

8 27. Sweigert attempted to intervene in Steele v Goodman but was denied. In support of  
9 his attempt, several non-parties to the suit submitted declarations in support of  
10 intervention. One of those non-parties was a citizen of New Zealand Steve Outtrim  
11 (hereinafter "Outtrim") (**EXHIBIT E**)  
12

13 28. Outtrim falsely claims to be a citizen of California, but this is untrue. His address of  
14 record is a PO Box at a commercial mailing business and his filing with the clerk of  
15 the court is clearly seen to be sent via airmail from his residence in New Zealand.  
16 (ECF No. 109 page 4)  
17

18 29. Outtrim is presently attempting to intervene in this instant legal matter (ECF No.  
19 109). Outtrim initially attempted to inappropriately communicate directly with  
20 chambers via an email address provided to the litigants by Magistrate Judge Stewart  
21 Aaron. It is Goodman's belief that Sweigert provided this email address to Outtrim.  
22

23 30. Outtrim has published multiple false stories defaming Goodman on his own blog  
24 including allegations of Goodman causing political unrest in Ukraine.

25 [https://burners.me/2018/12/03/insane-in-the-ukraine-j-go-like-youve-never-seen-him-](https://burners.me/2018/12/03/insane-in-the-ukraine-j-go-like-youve-never-seen-him-before/)  
26 [before/](https://burners.me/2018/12/03/insane-in-the-ukraine-j-go-like-youve-never-seen-him-before/) The allegations are false, have no basis in fact or evidence and no purpose  
27  
28

1 other than harassment and defamation of Goodman. Publishing the article was an  
 2 overt act in furtherance of the conspiracy on Outtrim's part.

3 31. On November 29, 2019 Sweigert re-published Outtrim's article on his own sdney.news  
 4 blog [https://sdney.news/2019/11/29/insane-in-the-ukraine-j-go-like-youve-never-seen-](https://sdney.news/2019/11/29/insane-in-the-ukraine-j-go-like-youve-never-seen-him-before-updates-burners-me-me-burners-and-the-man/)  
 5 [him-before-updates-burners-me-me-burners-and-the-man/](https://sdney.news/2019/11/29/insane-in-the-ukraine-j-go-like-youve-never-seen-him-before-updates-burners-me-me-burners-and-the-man/) Republishing the Outtrim  
 6 false story was another overt act on Sweigert's part in furtherance of the conspiracy.  
 7

8 32. The Outtrim article makes the categorically false statement "*Jason Goodman is the*  
 9 *CEO of a company which is operating the world's most advanced commercial HD*  
 10 *video drone in Ukraine at the exact time a Western-backed coup breaks out there.*"  
 11

12 Both Outtrim and Sweigert use this claim in attempts to accuse Goodman of heinous  
 13 crimes including terrorism, subversion of foreign governments and involvement in a  
 14 recent explosion at a liquid natural gas facility in Texas. Aside from public news  
 15 reports Goodman has no knowledge of or involvement in the Texas LNG incident.  
 16

17 33. The most recent publication of the Outtrim false allegations and the overt efforts to  
 18 link Goodman to terrorism and crimes Goodman has no knowledge of or involvement  
 19 in represents a pattern and practice when viewed in the context of the incidents in  
 20 question in *Steele v. Goodman*, and yet another overt act in furtherance of the  
 21 conspiracy.  
 22

## 23 JURISDICTION AND VENUE

24 34. This is an action for damages in an amount in excess of the minimum jurisdictional  
 25 limits of this Court.

26 35. This Court has jurisdiction over this dispute pursuant to 28 U.S.C. §1332 (diversity  
 27 jurisdiction) in that Sweigert and Goodman are citizens of different states and the  
 28



1 amount in controversy exceeds seventy-five thousand (\$75,000), exclusive of interest  
2 and costs.

3 36. This Court has personal jurisdiction over Counter Plaintiff. Counter Plaintiff resides  
4 in New York City; Counter Defendant alleges to conduct regular business in New  
5 York City; and this action is being brought in response to Case 1:18-cv-08653-VEC-  
6 SDA Document 1 Filed 06/14/18 within the Southern District of New York.

7  
8 37. Venue is proper in this Court as (a) the cause of action arose within the jurisdiction of  
9 this Court and (b) Counter Plaintiff resides within this District.

10 **PARTIES**

11  
12 38. Counter Plaintiff Jason Goodman is an individual who is a citizen of New York and  
13 resides 252 7<sup>th</sup> Avenue apartment 6s New York, NY 10001

14 39. Counter Defendant David George Sweigert is believed to be a resident of California,  
15 currently utilizing a PO Box address, General Delivery Rough and Ready CA 95975.

16 40. Co-conspirators include but are not limited to; Counter Defendant's own brother  
17 George Webb Sweigert, believed to be a resident of Maryland

18  
19 41. Plaintiff in Steele v. Goodman Robert David Steele 11005 Langton Arms Court  
20 Oakton, VA 22124

21 42. Council for Plaintiff in Steele v. Goodman Steven S. Biss 300 W Main St Ste 102  
22 Charlottesville, VA, 22903-5575

23 43. co-Defendant in Steele v. Goodman Patricia Negron (hereinafter "Negron") 925  
24 Webster St Unit 3 Needham, MA 02492

25  
26 44. co-Defendant in Steele v. Goodman Susan Lutzke, aka Susan Holmes, aka Queen Tut  
27 (hereinafter "Holmes"), 2608 Leisure Dr Unit B Fort Collins CO 80525  
28

1 45. Oakey Marshall Richards (hereinafter "Richards"), believed to be a citizen of West  
2 Virgina

3 46. Counsel for Plaintiff Biss' wife and alleged sister of Tyroan Simpson Tanya Cornwell  
4 (hereinafter "Cornwell"), 8035 Scottsville Rd. Scottsville, VA 24590

5 47. Manuel Chavez III (hereinafter "Chavez"), believed to be a resident of Nevada

6 48. Steve Outtrim (hereinafter "Outtrim"), 1370 Trancas St PO Box 102 Napa CA 94558

7 49. Tyroan Simpson aka Frank Bacon (hereinafter "Simpson"), believed to be a citizen of  
8 Texas

9 50. Nathan Stolpman (hereinafter "Stolpman"), 930 Anna Cir. Nipomo, CA 934

10 51. Marion Rapp (hereinafter "Rapp"), PO Box 152 Mesa AZ, 85211

11 52. Dean Fougere aka Titus Frost (hereinafter "Fougere") 154 Lake Dr. Plymouth, MA  
12 02360 and others including individuals whose true identities remain unknown to  
13 Counter Plaintiff.

#### 14 **FACTUAL ALLEGATIONS**

15 53. Counter Plaintiff does not know Counter Defendant and has never met Counter  
16 Defendant.

17 54. Counter Plaintiff Goodman became aware of counter Defendant Sweigert after  
18 members of Goodman's viewing audience brought various social media posts made  
19 by Sweigert to Goodman's attention.

20 55. To the best of Counter Plaintiff's knowledge, Goodman's association with Sweigert's  
21 brother Webb, prompted Sweigert to begin making regular social media post on  
22 YouTube and elsewhere criticizing and commenting on the quality of journalism  
23 observed by Sweigert.

1 56. Sweigert expressed a universally negative opinion of Goodman, criticizing virtually  
2 every aspect including personal characteristics such as height, appearance, age  
3 associated male pattern hair loss, facial expressions and other aspects irrelevant to the  
4 truth or falsehood of the information reported.

5  
6 57. Sweigert made numerous videos criticizing his brother and detailing various aspects  
7 of their family history. These details included statements about the mental health  
8 history of their deceased father and a particularly disturbing account of Webb  
9 engaging in sexual intercourse with Sweigert's former wife.

10  
11 58. On June 13, 2017, Webb invited Goodman to participate in a Skype video conference  
12 that included Webb, Steele and Negrón. Webb had introduced Goodman to Negrón  
13 only days prior.

14 59. On the following day, Webb participated in a YouTube broadcast with Goodman and  
15 Negrón during which Webb alleged to have received information from Richards  
16 indicating the presence of illicit nuclear material on board a shipping vessel the  
17 Maersk Memphis. Webb went into great detail, revealing the ship was imminently  
18 docking in the Port of Charleston and that it represented a substantial threat of a  
19 potential "dirty bomb".  
20

21 60. Goodman knew nothing of this information prior to the June 14 Skype telephone call  
22 from Webb.

23  
24 61. Webb specifically stated the possibility of a dirty bomb represented a public threat  
25 greater in scope and danger than 9/11.  
26  
27  
28

1 62. Webb specifically told Goodman failure to alert authorities could be the crime of  
2 misprision of felony or misprision of treason and failure to act could put Goodman in  
3 legal jeopardy.

4 63. Goodman contacted the U.S. Coast Guard by telephone and provided no substantial  
5 information as the Coast guard officer alerted Goodman, they were already aware of  
6 the matter and had taken action deemed appropriate.

7 64. Webb was arrested in Ohio that evening on an unrelated charge, for being drunk and  
8 asleep in his car at the roadside. Webb was charged with failure to control his vehicle  
9 and was subsequently questioned by police, the FBI and the joint terrorism task force  
10 representative who acts as a liaison between the Coast Guard and the FBI.

11 65. Goodman has never been questioned by the FBI with regard to this matter.

12 66. To the best of Goodman's knowledge, Goodman has never been the subject of a  
13 criminal investigation and has never been a suspect in any crime.

14 67. On the following day, June 15 2017, Goodman received an email message from  
15 Steele that was carbon copied to Webb. In the message, Steele confidently states that  
16 Goodman will be imminently arrested by NYPD for calling in a bomb hoax in the  
17 port of Charleston. Steele urged Webb to terminate his collaboration with Goodman  
18 and to commence an association with Steele and his 501(c)(3) tax exempt  
19 organization.

20 68. Goodman never called in any bomb hoax and has never been arrested, nor formally  
21 accused of any crime.

1 69. Almost immediately following the incident in the Port of Charleston, Counter  
2 Defendant Sweigert began parroting the claims made by Steele, publicly demanding  
3 the FBI investigate Goodman for his alleged role in the alleged "dirty bomb hoax"  
4

5 70. Subsequent to these events, Sweigert wrote and self-published a book rife with false  
6 allegations accusing Goodman of plotting, planning, overseeing, coordinating  
7 otherwise playing some key role in the alleged bomb hoax. **(EXHIBIT F)**

8 71. Sweigert has contacted numerous law enforcement agencies including the U.S. Coast  
9 Guard New York Sector making false allegations of crimes attributed to Counter  
10 Plaintiff Goodman.  
11

12 72. Sweigert has written numerous emails and letters to key business associates of  
13 Goodman including the chief legal counsel and Chief executive officer of Patreon,  
14 Goodman's primary source of income. The letters contain false allegations against  
15 Goodman and threaten Patreon with legal action should they continue to allow  
16 Goodman to transact business with Patreon.  
17

18 73. Sweigert has persistently and continuously repeated the lie that Goodman planned,  
19 oversaw and / or participated in a scheme to perpetrate a dirty bomb hoax. He now  
20 echoes this, nearly identically, claiming Goodman had foreknowledge and / or some  
21 involvement in explosions at a Texas LNG facility. These statements are  
22 categorically false and are totally unsupported by facts or evidence.  
23

24 74. Sweigert's co-conspirators have engaged in overt acts in furtherance of their  
25 conspiracy, providing positive reviews of the book intended to bolster sales of the  
26 book.  
27  
28

### COUNT 1 DEFAMATION

75. Counter Plaintiff Goodman re-alleges paragraphs 1 – 74 as if the same were fully set forth herein. Sweigert made his false and defamatory statements deliberately and maliciously with the intent to intimidate, discredit and defame Goodman.
76. Sweigert and co-conspirators engaged in Defamation Per Se on several occasions by deliberately making false statements which were published to third-parties without privilege of authorization; with fault amounting to AT LEAST negligence; that caused special harm.
77. Because Sweigert's false allegations of international terrorism or foreknowledge of terrorist events are such heinous false statements likely to cause public hate toward Goodman implying involvement in criminal activity, damages to worldwide reputation are inherent.

### COUNT 2 AGGRAVATED HARASSMENT

78. Counter Plaintiff Goodman re-alleges paragraphs 1 – 77 as if the same were fully set forth herein. Sweigert made his false and defamatory statements deliberately and maliciously with the intent to intimidate and harass Goodman
79. Sweigert and co-conspirators engaged in Aggravated harassment in the second degree, a violation of 40 N.Y. Con. Laws Ann. § 240.30

### COUNT 3 CIVIL CONSPIRACY

80. It is textbook law that New York does not recognize an independent tort of conspiracy. If an underlying, actionable tort is established, however, [the] Plaintiff may plead the existence of a conspiracy in order to demonstrate that each defendant's conduct was part of a common scheme." *Sepenuk v. Case 1:15-cv-04244-JGK Document 214 Filed 09/12/16 Page 72 of 88* 73 Marshall, No. 98-cv-1569 (RCC), 2000 WL 1808977, at (S.D.N.Y. Dec. 8, 2000) (citation omitted). To establish a claim of civil conspiracy, the plaintiffs "must demonstrate the primary tort, plus the following four elements: (1) an agreement between two or more parties; (2) an overt act in furtherance of the agreement; (3) the parties' intentional participation in the furtherance of a plan or purpose; and (4) resulting damage or injury." *World Wrestling Fed'n Entm't, Inc. v. Bozell*, 142 F. Supp. 2d 514, 532 (S.D.N.Y. 2001). Under New York law, in order to be liable for acting in concert with a primary tortfeasor under a theory of either conspiracy or aiding and abetting, the defendant must know of the wrongful nature of the primary actor's conduct. *Pittman by Pittman v. Grayson*, 149 F.3d 111, 123 (2d Cir. 1998). "It is essential that each defendant charged with acting in concert have acted tortiously and that one of the defendants committed an act in pursuance of the agreement which constitutes a tort." *Rastelli v. Goodyear Tire & Rubber Co.*, 591 N.E.2d 222, 224 (N.Y. 1992).

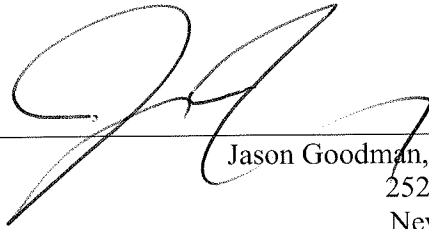
**PRAYER FOR RELIEF**

WHEREFORE, Counter Plaintiff Goodman respectfully requests judgment against Counter Defendant Sweigert, awarding compensatory, consequential, exemplary, and punitive damages in an amount to be determined at trial, but in excess of the \$75,000 jurisdictional requirement; expenses and fees related to this suit; and such other and further relief as the Court may deem just and proper.

I hereby attest that the pleadings herein are accurate and true under penalties of perjury.

Further, I hereby attest that the attached exhibits are accurate and true copies of source documents as described.

Signed this 29<sup>th</sup> day of November 2019



Jason Goodman, Defendant, Pro Se  
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**(EXHIBIT A)**



**EXHIBIT A**

TRANSCRIPT OF MULTI-PARTY VIDEO CHAT BETWEEN D. GEORGE SWEIGERT,  
TYROAN SIMPSON, MANUEL CHAVEZ III, NATHAN STOLPMAN, CHERI AND  
HOAXWARS PUBLISHED ON YOUTUBE

Video and audio evidence available (<https://www.bitchute.com/video/Ez5xgxUk8daU/>)

1

00:00:00,000 --> 00:00:05,190

picture go find this person where are

2

00:00:02,580 --> 00:00:07,140

where is this person and that's where

3

00:00:05,190 --> 00:00:10,740

you cross the line you can't swim your

4

00:00:07,140 --> 00:00:12,570

forehead okay I apologize we see your

5

00:00:10,740 --> 00:00:14,099

forehead again I think that's good I

6

00:00:12,570 --> 00:00:16,650

think that's good for one night guys and

7

00:00:14,099 --> 00:00:18,359

I think you know that there are other

8

00:00:16,650 --> 00:00:21,270

things that could be being discussed

9

00:00:18,359 --> 00:00:22,949

right now and this little uh SIOP it's

10

00:00:21,270 --> 00:00:24,930

an infection it's an infection it's

11

00:00:22,949 --> 00:00:26,430

getting into everybody's heads nobody

12

00:00:24,930 --> 00:00:29,460

trusts anybody there's a lot of paranoia

13

00:00:26,430 --> 00:00:31,050

going on I've discussed this many times

14

DEFENDANT'S OPPOSITION TO THE MOTION TO INTERVENE EXHIBIT A - 1

1 00:00:29,460 --> 00:00:32,430  
on my radio show that nobody listens to  
2 15  
3 00:00:31,050 --> 00:00:34,649  
and everybody seems to think I'm just  
4 16  
5 00:00:32,430 --> 00:00:36,090  
some kind of control but I'm actually  
6 17  
7 00:00:34,649 --> 00:00:39,590  
listened to by twenty thousand people in  
8 18  
9 00:00:36,090 --> 00:00:44,610  
Austin Texas including Alex Jones so  
10 19  
11 00:00:39,590 --> 00:00:49,379  
this is what's fun i've had i've kind of  
12 20  
13 00:00:44,610 --> 00:00:51,600  
went off a little bit but i'm alright i  
14 21  
15 00:00:49,379 --> 00:00:53,370  
just want to be friends but i want you  
16 22  
17 00:00:51,600 --> 00:00:54,989  
to stop being like alright two fingers  
18 23  
19 00:00:53,370 --> 00:00:56,520  
my friends but he's a fucking agent and  
20 24  
21 00:00:54,989 --> 00:00:59,160  
he's a piece of shit i don't want to  
22 25  
23 00:00:56,520 --> 00:01:01,109  
hear that about you i say that you know  
24 26  
25 00:00:59,160 --> 00:01:03,359  
nathan is fuckin nathan I made you a  
26 27  
27 00:01:01,109 --> 00:01:06,030  
crypto kitty bro and there's people on  
28 28  
29 00:01:03,359 --> 00:01:08,070  
as people yeah you want dude I'm selling  
30 29  
31 00:01:06,030 --> 00:01:09,420  
it right now for like a theory amigos

DEFENDANT'S OPPOSITION TO THE MOTION TO INTERVENE EXHIBIT A - 2

1 30  
00:01:08,070 --> 00:01:11,220  
2 you know you're a YouTube star or  
3 31  
00:01:09,420 --> 00:01:13,290  
4 whatever but I mean I'll send it to you  
5 32  
00:01:11,220 --> 00:01:14,850  
6 I'm gonna put I'm gonna put LTVs face on  
7 33  
00:01:13,290 --> 00:01:16,170  
8 a coffee cup I'm gonna put out you do  
9 34  
00:01:14,850 --> 00:01:21,390  
10 that baby why don't you do that that's  
11 35  
00:01:16,170 --> 00:01:23,850  
12 how this all gets I made him a crypto  
13 36  
00:01:21,390 --> 00:01:25,920  
14 kitty but yeah you know like if nobody  
15 37  
00:01:23,850 --> 00:01:29,729  
16 but if any nobody buys it I'm gonna  
17 38  
00:01:25,920 --> 00:01:31,259  
18 fuckin send it to you let's talk about  
19 39  
00:01:29,729 --> 00:01:33,240  
20 how to take the the people in the  
21 40  
00:01:31,259 --> 00:01:35,460  
22 audience up the next level in the next  
23 41  
00:01:33,240 --> 00:01:37,500  
24 chain in all this and tell as many  
25 42  
00:01:35,460 --> 00:01:41,009  
26 people as I can for the Christmas time  
27 43  
00:01:37,500 --> 00:01:43,500  
28 for the show I'd be willing to buy  
44  
00:01:41,009 --> 00:01:45,540  
anybody an account on Steam it they can  
45  
00:01:43,500 --> 00:01:47,670

1 direct message me on the hoax wars on  
46

2 00:01:45,540 --> 00:01:49,430  
3 the other that includes you Dave I think  
47

4 00:01:47,670 --> 00:01:52,890  
5 that's the best way to get it  
48

6 00:01:49,430 --> 00:01:54,479  
7 JG I I think if you look at a unified  
49

8 00:01:52,890 --> 00:01:55,829  
9 effort and I got a lot of training in  
50

10 00:01:54,479 --> 00:01:57,119  
11 the government and all the rest of this  
51

12 00:01:55,829 --> 00:01:57,810  
13 stuff because I was in the military at a  
52

14 00:01:57,119 --> 00:02:00,149  
15 young age  
53

16 00:01:57,810 --> 00:02:01,799  
17 it's a unified effort and everybody has  
54

18 00:02:00,149 --> 00:02:03,329  
19 lanes and what's happening is people are  
55

20 00:02:01,799 --> 00:02:05,159  
21 getting in each other's lanes and I told  
56

22 00:02:03,329 --> 00:02:07,409  
23 I told everybody on the fan go show like  
57

24 00:02:05,159 --> 00:02:09,119  
25 two weeks ago I'm the government liaison  
58

26 00:02:07,409 --> 00:02:11,670  
27 I don't want to do anything else if you  
59

28 00:02:09,119 --> 00:02:13,140  
60 need a stand and LTV will tell you if  
61

you need a nasty letter  
61

1 00:02:13,140 --> 00:02:17,819  
written Dave's your guy if you want to  
2 62  
3 00:02:14,940 --> 00:02:20,069  
make wheels of pagans that's right I  
4 63  
5 00:02:17,819 --> 00:02:21,420  
mean I know what a lawyers do what do  
6 64  
7 00:02:20,069 --> 00:02:22,800  
lawyers do what a congressman do  
8 65  
9 00:02:21,420 --> 00:02:25,740  
whatever they know that we know they  
10 66  
11 00:02:22,800 --> 00:02:27,930  
ain't that's a no the Inc so I  
12 67  
13 00:02:25,740 --> 00:02:29,250  
volunteer to be the liaison to fuck  
14 68  
15 00:02:27,930 --> 00:02:31,440  
with these guys through government  
16 69  
17 00:02:29,250 --> 00:02:33,150  
processes through military processes  
18 70  
19 00:02:31,440 --> 00:02:35,880  
through law enforcement processes that's how  
20 71  
21 00:02:33,150 --> 00:02:38,790  
I'm fuckin with my but I want that is a  
22 72  
23 00:02:35,880 --> 00:02:40,470  
con man and I want to be right now  
24 73  
25 00:02:38,790 --> 00:02:42,360  
finish the demon you know can Ralph it's  
26 74  
27 00:02:40,470 --> 00:02:44,459  
essential you can write that into the  
28 75  
00:02:42,360 --> 00:02:46,890  
watching you'd have you have an amazing  
76  
00:02:44,459 --> 00:02:49,200  
what platform there my friend and if

1 77  
00:02:46,890 --> 00:02:50,520  
2 reason I got started with that I got  
3 78  
00:02:49,200 --> 00:02:51,450  
4 started with that at the grassroots  
79  
5 00:02:50,520 --> 00:02:53,250  
6 level because people were getting  
80  
7 00:02:51,450 --> 00:02:54,150  
8 hassled by bill collectors people were  
81  
9 00:02:53,250 --> 00:02:56,519  
10 getting hassled by debt collectors  
82  
11 00:02:54,150 --> 00:02:58,200  
12 people were getting hassled by the IRS I  
83  
13 00:02:56,519 --> 00:02:59,489  
14 started fixing people's tickets I  
84  
15 00:02:58,200 --> 00:03:01,470  
16 started getting debt collectors off  
85  
17 00:02:59,489 --> 00:03:04,739  
18 their ass so I started at a very  
86  
19 00:03:01,470 --> 00:03:06,300  
20 grassroots level of mothers with two  
87  
21 00:03:04,739 --> 00:03:07,769  
22 kids that were single mothers that had  
88  
23 00:03:06,300 --> 00:03:09,690  
24 bill collectors coming after their ass I  
89  
25 00:03:07,769 --> 00:03:11,640  
26 started writing letters that I started  
90  
27 00:03:09,690 --> 00:03:12,900  
28 doing that like 30 years ago so I'm the  
91  
00:03:11,640 --> 00:03:15,720  
letter writer I don't want to do  
92  
00:03:12,900 --> 00:03:16,980

1 anything else than letting on that let  
93  
2 00:03:15,720 --> 00:03:19,890  
3 me get you on steam it and let's get  
94  
4 00:03:16,980 --> 00:03:21,720  
5 those letters written write them all the  
95  
6 00:03:19,890 --> 00:03:24,239  
7 time but listen I'm writing that shit  
96  
8 00:03:21,720 --> 00:03:26,310  
9 all the time behind the scenes on Jason  
97  
10 00:03:24,239 --> 00:03:28,500  
11 and George I'm doing it all the time I  
98  
12 00:03:26,310 --> 00:03:29,850  
13 like you guys paid for it now I can get  
99  
14 00:03:28,500 --> 00:03:32,579  
15 you paid for it in a way that's not  
100  
16 00:03:29,850 --> 00:03:34,920  
17 connected government at all I know that  
101  
18 00:03:32,579 --> 00:03:36,540  
19 sounds like that I know that sounds  
102  
20 00:03:34,920 --> 00:03:37,920  
21 sketchy but it's not the truth let me  
103  
22 00:03:36,540 --> 00:03:40,019  
23 just finish this point let me just  
104  
24 00:03:37,920 --> 00:03:41,280  
25 finish this point that's that's my role  
105  
26 00:03:40,019 --> 00:03:43,110  
27 I don't want to be in any other role  
106  
28 00:03:41,280 --> 00:03:45,600  
that's my lane I'll stay in my lane I  
107  
00:03:43,110 --> 00:03:47,579  
don't I don't want to be on call-in  
108

1 00:03:45,600 --> 00:03:49,739  
shows or this or that or figure out  
2 109  
3 00:03:47,579 --> 00:03:51,840  
puzzles everybody's got to find their  
4 110  
5 00:03:49,739 --> 00:03:55,049  
part in this and do their part that's it  
6 111  
7 00:03:51,840 --> 00:03:57,450  
I do radio with me yeah I used to do  
8 112  
9 00:03:55,049 --> 00:04:01,470  
radio a long time ago see jlw yeah I'll  
10 113  
11 00:03:57,450 --> 00:04:02,910  
do radio you undo radio let's do it yeah  
12 114  
13 00:04:01,470 --> 00:04:04,230  
as long as I could take Dave act and  
14 115  
15 00:04:02,910 --> 00:04:06,060  
because if you start throwing my real  
16 116  
17 00:04:04,230 --> 00:04:07,110  
name out there I become ineffective and  
18 117  
19 00:04:06,060 --> 00:04:09,329  
what I'm trying to do behind the scenes  
20 118  
21 00:04:07,110 --> 00:04:12,660  
well my name is Frank bacon nobody's  
22 119  
23 00:04:09,329 --> 00:04:16,350  
giving me shit about that so well I gave  
24 120  
25 00:04:12,660 --> 00:04:18,329  
you shit I just got a load I got a load  
26 121  
27 00:04:16,350 --> 00:04:21,030  
of bad news I mean I figured I'd just  
28 122  
00:04:18,329 --> 00:04:23,220  
share to you guys right here live I got  
123  
00:04:21,030 --> 00:04:25,919  
a message from the federal student aid



1 124  
00:04:23,220 --> 00:04:27,030  
2 office and it says you were receiving  
3 125  
00:04:25,919 --> 00:04:29,610  
4 the same  
5 126  
00:04:27,030 --> 00:04:32,430  
6 because a student debt relief company  
127  
7 00:04:29,610 --> 00:04:33,750  
that the FTC has recently taken action  
8 128  
9 00:04:32,430 --> 00:04:37,920  
against as a part of a larger  
10 129  
00:04:33,750 --> 00:04:40,500  
11 enforcement has basically done illegal  
12 130  
00:04:37,920 --> 00:04:43,140  
13 has dead illegal upfront fees and made  
14 131  
00:04:40,500 --> 00:04:45,330  
15 false promises on reduced stone student  
132  
16 00:04:43,140 --> 00:04:49,530  
loan forgiveness payments so it looks  
17 133  
00:04:45,330 --> 00:04:53,760  
18 like my student loan that I thought that  
19 134  
00:04:49,530 --> 00:04:56,430  
20 I had taken care of is now in flux see I  
21 135  
00:04:53,760 --> 00:04:58,470  
22 would know how to unravel that and but  
136  
23 00:04:56,430 --> 00:05:00,210  
you would that go away that you would  
24 137  
00:04:58,470 --> 00:05:03,660  
25 know I'd make it go away for Dibango  
26 138  
00:05:00,210 --> 00:05:06,090  
27 yeah yeah like I did this a couple  
28 139  
00:05:03,660 --> 00:05:08,669

DEFENDANT'S OPPOSITION TO THE MOTION TO INTERVENE EXHIBIT A - 9

1 months ago like I had to pay like I had  
140  
2 00:05:06,090 --> 00:05:10,260  
3 to pay like three thousand dollars over  
141  
4 00:05:08,669 --> 00:05:12,210  
5 I had to pay like three thousand dollars  
142  
6 00:05:10,260 --> 00:05:13,530  
7 to get them to buy up my loan and then  
143  
8 00:05:12,210 --> 00:05:15,360  
9 they said that they brought it down to  
144  
10 00:05:13,530 --> 00:05:17,250  
11 like eleven thousand or something like  
145  
12 00:05:15,360 --> 00:05:18,480  
13 that and I was like great so I've been  
146  
14 00:05:17,250 --> 00:05:20,040  
15 paying on that like you know  
147  
16 00:05:18,480 --> 00:05:23,010  
17 seventy-five bucks a month or whatever  
148  
18 00:05:20,040 --> 00:05:25,470  
19 for a while now just basically cashing  
149  
20 00:05:23,010 --> 00:05:28,080  
21 it out of my crypto profits off our food  
150  
22 00:05:25,470 --> 00:05:30,030  
23 it's Oliphant and I'm just like oh are  
151  
24 00:05:28,080 --> 00:05:32,070  
25 you kidding me right now like it says it  
152  
26 00:05:30,030 --> 00:05:34,470  
27 since October like they took action  
153  
28 00:05:32,070 --> 00:05:37,650  
against these guys and what that's a  
154  
00:05:34,470 --> 00:05:40,070  
good example and I appreciate you know  
155

1 00:05:37,650 --> 00:05:42,750  
Nathan ice I supported you after you got  
2 156  
3 00:05:40,070 --> 00:05:46,050  
pushed around in San Francisco I did  
4 157  
5 00:05:42,750 --> 00:05:47,610  
videos supporting you as a journalist  
6 158  
7 00:05:46,050 --> 00:05:50,370  
and I understand your feelings and I  
8 159  
9 00:05:47,610 --> 00:05:52,260  
understand that I come on my kind of  
10 160  
11 00:05:50,370 --> 00:05:53,940  
rough and tough and all that but the  
12 161  
13 00:05:52,260 --> 00:05:55,830  
fango brings up a really good point here  
14 162  
15 00:05:53,940 --> 00:05:57,030  
is how many people especially people  
16 163  
17 00:05:55,830 --> 00:05:58,290  
listed in this audience and I know  
18 164  
19 00:05:57,030 --> 00:05:59,910  
there's thousands and millions of people  
20 165  
21 00:05:58,290 --> 00:06:02,550  
how many people are in the control  
22 166  
23 00:05:59,910 --> 00:06:04,050  
matrix because they get a letter they  
24 167  
25 00:06:02,550 --> 00:06:05,190  
get think they get their phone bill they  
26 168  
27 00:06:04,050 --> 00:06:06,510  
get a letter from the bank they get a  
28 169  
00:06:05,190 --> 00:06:08,010  
letter from student loans and it just  
170  
00:06:06,510 --> 00:06:09,900  
fucks their life up they think about it

DEFENDANT'S OPPOSITION TO THE MOTION TO INTERVENE EXHIBIT A - 11

1 171  
00:06:08,010 --> 00:06:13,740  
2 constantly and the quality of their life  
3 172  
00:06:09,900 --> 00:06:15,870  
4 just goes down the tubes and those kind  
5 173  
00:06:13,740 --> 00:06:17,280  
6 of things need to be fought against  
7 174  
00:06:15,870 --> 00:06:19,080  
8 those kinds of things need to be  
9 175  
00:06:17,280 --> 00:06:21,120  
10 neutralized people need to learn how to  
11 176  
00:06:19,080 --> 00:06:22,890  
12 fight back people have to fight back  
13 177  
00:06:21,120 --> 00:06:24,180  
14 against the debt collectors in the IRS  
15 178  
00:06:22,890 --> 00:06:25,500  
16 and all these other people that are  
17 179  
00:06:24,180 --> 00:06:27,270  
18 coming after him so they could improve  
19 180  
00:06:25,500 --> 00:06:30,990  
20 their quality of life as long as people  
21 181  
00:06:27,270 --> 00:06:32,160  
22 are bogged down and hit and and pounded  
23 182  
00:06:30,990 --> 00:06:34,530  
24 with all these things that keep coming  
25 183  
00:06:32,160 --> 00:06:36,690  
26 up at court costs this and that net they  
27 184  
00:06:34,530 --> 00:06:38,099  
28 can't ever effectively unite and that's  
185  
00:06:36,690 --> 00:06:41,430  
part of the control grid that's part of  
186  
00:06:38,099 --> 00:06:45,180

1 this major amen it's 90 memory one  
187  
2 00:06:41,430 --> 00:06:46,889  
3 I see that all the time and that's what  
188  
4 00:06:45,180 --> 00:06:49,919  
5 I'm seeing right now at YouTube and I  
189  
6 00:06:46,889 --> 00:06:53,400  
7 see the nature of the miscommunication  
190  
8 00:06:49,919 --> 00:06:54,539  
9 between everybody between you know I'll  
191  
10 00:06:53,400 --> 00:06:55,830  
11 be honest with you anything I reached  
192  
12 00:06:54,539 --> 00:06:58,050  
13 out did a fango one of the first things  
193  
14 00:06:55,830 --> 00:07:00,690  
15 I asked him for after after we met was  
194  
16 00:06:58,050 --> 00:07:02,460  
17 hey can you put me in touch with David  
195  
18 00:07:00,690 --> 00:07:05,069  
19 Seaman because David's a fellow  
196  
20 00:07:02,460 --> 00:07:07,650  
21 Coloradoan and my mother loves his show  
197  
22 00:07:05,069 --> 00:07:10,199  
23 and my work my art has always been about  
198  
24 00:07:07,650 --> 00:07:13,620  
25 one thing and one thing only is to be  
199  
26 00:07:10,199 --> 00:07:15,750  
27 entertaining only to my family I could  
200  
28 00:07:13,620 --> 00:07:17,659  
201  
I care less what else thinks about me and  
202  
I certainly don't give a shit about like

1 00:07:17,659 --> 00:07:21,960  
imaginary friends on the Internet unless  
2 203  
3 00:07:20,250 --> 00:07:24,330  
I can speak more meet the meatbag  
4 204  
5 00:07:21,960 --> 00:07:27,449  
themselves to me they're an infected  
6 205  
7 00:07:24,330 --> 00:07:29,430  
Agent Smith as far as I'm concerned and  
8 206  
9 00:07:27,449 --> 00:07:31,020  
I think that's what we're seeing is more  
10 207  
11 00:07:29,430 --> 00:07:33,710  
of the infection of the agent Smith's  
12 208  
13 00:07:31,020 --> 00:07:37,229  
because like what Dave just explained  
14 209  
15 00:07:33,710 --> 00:07:38,969  
people get triggered very easily and my  
16 210  
17 00:07:37,229 --> 00:07:41,370  
Syfy work has always gone back to one  
18 211  
19 00:07:38,969 --> 00:07:43,199  
specific sci-fi author named Robert  
20 212  
21 00:07:41,370 --> 00:07:45,810  
Anton Wilson who wrote a book called the  
22 213  
23 00:07:43,199 --> 00:07:47,310  
cosmic carrier and the cosmic trigger is  
24 214  
25 00:07:45,810 --> 00:07:49,680  
one of the most mind opening  
26 215  
27 00:07:47,310 --> 00:07:51,030  
mind-altering drugs on the planet I hope  
28 216  
217  
someday but if they don't they could

1 218  
00:07:52,560 --> 00:07:57,150  
2 read my psyche ion steamin where I'm  
3 219  
00:07:54,180 --> 00:07:59,460  
4 making I'm making money shitposting my  
220  
5 00:07:57,150 --> 00:08:01,279  
6 crappy sci-fi and I'm just looking for  
221  
7 00:07:59,460 --> 00:08:03,840  
8 friends along the way that get the joke  
222  
9 00:08:01,279 --> 00:08:05,909  
Jason's not one of those guys he doesn't  
10 223  
00:08:03,840 --> 00:08:08,880  
11 get the joke he works for me you know  
224  
12 00:08:05,909 --> 00:08:11,550  
13 it's nobody you said that agent smith  
225  
14 00:08:08,880 --> 00:08:13,919  
15 thing just something in my brain that I  
226  
16 00:08:11,550 --> 00:08:16,650  
17 was thinking about yesterday kind of  
227  
18 00:08:13,919 --> 00:08:18,900  
19 just offhand um you know when the if you  
228  
20 00:08:16,650 --> 00:08:22,620  
21 watch the matrix in the very last part  
229  
22 00:08:18,900 --> 00:08:24,690  
23 where neo gets shot or whatever and you  
230  
24 00:08:22,620 --> 00:08:26,550  
25 know he takes all the bullets and he  
231  
26 00:08:24,690 --> 00:08:28,469  
27 slides down the wall and all the agents  
232  
28 00:08:26,550 --> 00:08:30,270  
29 are looking at him and shit you know  
233  
00:08:28,469 --> 00:08:32,190

1 like in that point when he died or  
234  
2 00:08:30,270 --> 00:08:33,930  
3 whatever you know most people would have  
235  
4 00:08:32,190 --> 00:08:35,610  
5 thought that he would have became the  
236  
6 00:08:33,930 --> 00:08:36,180  
7 one at that point but he really really  
237  
8 00:08:35,610 --> 00:08:38,250  
9 did it  
238  
10 00:08:36,180 --> 00:08:40,289  
11 he was like in the middle of his death  
239  
12 00:08:38,250 --> 00:08:42,000  
13 cycle and when he jumped into the agent  
240  
14 00:08:40,289 --> 00:08:44,760  
15 Smith is really when he got all of his  
241  
16 00:08:42,000 --> 00:08:46,920  
17 power essentially it's because like you  
242  
18 00:08:44,760 --> 00:08:48,600  
19 know neo didn't have any powers and for  
243  
20 00:08:46,920 --> 00:08:49,949  
21 any of that stuff from before that it  
244  
22 00:08:48,600 --> 00:08:52,529  
23 was just kind of a glitch in the matrix  
245  
24 00:08:49,949 --> 00:08:54,540  
25 that allowed him to you know it when he  
246  
26 00:08:52,529 --> 00:08:57,660  
27 injunction to the other agent  
247  
28 00:08:54,540 --> 00:09:00,300  
248  
00:08:57,660 --> 00:09:02,250  
249  
know he basically like stole that agents



1 00:09:00,300 --> 00:09:04,620  
abilities and powers so it's like the  
2 250  
3 00:09:02,250 --> 00:09:07,230  
things that we were seeing those guys in  
4 251  
5 00:09:04,620 --> 00:09:11,100  
the black suits do you know we were only  
6 252  
7 00:09:07,230 --> 00:09:13,769  
seeing a very small subsection of what  
8 253  
9 00:09:11,100 --> 00:09:15,600  
they could really do you know cuz they  
10 254  
11 00:09:13,769 --> 00:09:17,670  
were still limited by their programming  
12 255  
13 00:09:15,600 --> 00:09:19,319  
you know neo didn't have those same  
14 256  
15 00:09:17,670 --> 00:09:21,269  
program on it so when he stole their  
16 257  
17 00:09:19,319 --> 00:09:24,959  
code you know he went it off better but  
18 258  
19 00:09:21,269 --> 00:09:26,670  
then it also allowed the other thing to  
20 259  
21 00:09:24,959 --> 00:09:28,259  
become you know like the big evil force  
22 260  
23 00:09:26,670 --> 00:09:30,600  
that was basically trying to you know  
24 261  
25 00:09:28,259 --> 00:09:32,250  
take over the entire matrix which is  
26 262  
27 00:09:30,600 --> 00:09:34,380  
really weird you know like we were  
28 263  
00:09:32,250 --> 00:09:35,819  
talking about the whole agent thing and  
264  
00:09:34,380 --> 00:09:37,649  
you know like I kind of like do you see

1 265  
00:09:35,819 --> 00:09:39,120  
2 that in the census like I don't like to  
3 266  
00:09:37,649 --> 00:09:41,160  
4 meet people in person you know like I  
5 267  
00:09:39,120 --> 00:09:43,050  
6 can't really you know trust you until  
7 268  
00:09:41,160 --> 00:09:44,880  
8 I've been able to be right next to you  
9 269  
00:09:43,050 --> 00:09:47,220  
10 and I've been able to experience your  
11 270  
00:09:44,880 --> 00:09:49,319  
12 energy field because I still believe  
13 271  
00:09:47,220 --> 00:09:51,839  
14 like right down to like the brass tacks  
15 272  
00:09:49,319 --> 00:09:53,699  
16 of things in our nurture interactions we  
17 273  
00:09:51,839 --> 00:09:56,160  
18 can't have very interesting connections  
19 274  
00:09:53,699 --> 00:09:58,170  
20 over vast distances utilizing systems  
21 275  
00:09:56,160 --> 00:09:59,850  
22 like the Internet because you know there  
23 276  
00:09:58,170 --> 00:10:01,709  
24 are things inside of us that are  
25 277  
00:09:59,850 --> 00:10:04,709  
26 connected and you know very meticulous  
27 278  
00:10:01,709 --> 00:10:06,329  
28 ways yet I believe that a lot of us  
29 279  
00:10:04,709 --> 00:10:07,260  
forget that you know we have that you  
30 280  
00:10:06,329 --> 00:10:08,490

1 know we still need that overall  
281

2 00:10:07,260 --> 00:10:11,389  
3 connection you don't like to meet people  
282

4 00:10:08,490 --> 00:10:11,389  
5 that's that's why

**(EXHIBIT B)**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

ROBERT DAVID STEELE, *et al.*,

Plaintiffs,

v.

Civil Action No. 3:17cv601

JASON GOODMAN, *et al.*,

Defendants.

ORDER

For the reasons stated in the accompanying Memorandum Opinion, the Court DENIES Sweigert's Motion to Intervene, (ECF No. 93), and will not consider future filings by Sweigert. The Court DENIES AS MOOT Sweigert's other motions. (ECF Nos. 102, 108, 124.) The Court STRIKES Sweigert's miscellaneous filings from the record. (ECF Nos. 51, 54, 55, 56, 58, 59, 60, 75, 77, 84, 103, 120, 137, 138, 140, 142, 145, 147, 149, 150.) The Court will address all other pending motions by separate Memorandum Opinion and Order. (ECF Nos. 109, 121, 126, 127.)

Let the Clerk send a copy of this Memorandum Opinion and Order to all counsel of record and to Sweigert, Goodman, and Lutzke at their respective addresses of record.

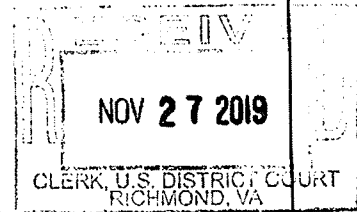
It is SO ORDERED.

Date: 7/25/19  
Richmond, Virginia

  
M. Hannah Lutzke  
United States District Judge

**(EXHIBIT C)**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA



RICHMOND DIVISION

ROBERT DAVID STEELE, et al.,

Plaintiff,

vs.

JASON GOODMAN, et al.,

Defendant

Case No.: 3:17-cv-00601-MHL

DEFENDANT'S MOTION TO DISQUALIFY  
COUNSEL FOR PLAINTIFF

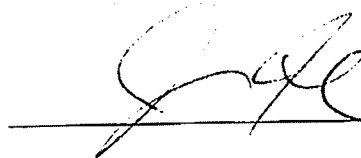
**DEFENDANT'S MOTION TO DISQUALIFY COUNSEL FOR PLAINTIFF**

Defendant Jason Goodman Pro Se respectfully moves the court to disqualify Steven S. Biss as counsel for Plaintiff. In the course of discovery, new information has come to light that makes it necessary for Defendant to call Steven S. Biss and his wife and paralegal Tanya Cornwell as witnesses. Testimony from Biss and Cornwell is expected to be prejudicial and adverse to the Plaintiff. In accordance with the Virginia State Bar Rules of Professional Conduct Rule 3.7 (a) and (b) it is just and necessary to disqualify Steven S. Biss and his law firm from representing Plaintiff Robert David Steele in this action so Biss may be called as a witness and testify under oath with regard to the facts of these matters..

1 I hereby attest that the pleadings herein are accurate and true under penalties of perjury. Further,

2 I hereby attest that the attached exhibits are accurate and true copies of source documents as  
3 described.

4 Signed this 26<sup>th</sup> day of November 2019  
5

6  
7  
8 

9 Jason Goodman, Defendant, Pro Se  
10 252 7<sup>th</sup> Avenue Apt 6s  
11 New York, NY 10001  
12 (323) 744-7594  
13 [truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)  
14  
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1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE EASTERN DISTRICT OF VIRGINIA

3 RICHMOND DIVISION

4 ROBERT DAVID STEELE, et al.,

5 Plaintiff,

6 vs.

7 JASON GOODMAN, et al.,

8 Defendant

Case No.: 3:17-cv-00601-MHL

DEFENDANT'S MEMORANDUM IN  
SUPPORT OF MOTION TO DISQUALIFY  
COUNSEL FOR PLAINTIFF

11 DEFENDANT'S MEMORANDUM IN SUPPORT OF MOTION TO DISQUALIFY  
12 COUNSEL FOR PLAINTIFF

28 DEFENDANT'S MEMORANDUM IN SUPPORT OF MOTION TO DISQUALIFY COUNSEL FOR PLAINTIFF

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17	DUTIES.	
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**PRELIMINARY STATEMENT**

This Memorandum in Support of Defendant's Motion to Disqualify Counsel for Plaintiff is respectfully submitted in support of the instant motion of Defendant, Jason Goodman Pro Se (hereinafter "Goodman" or "Defendant") seeking the disqualification of Steven S. Biss (hereinafter "Biss") from representing the Plaintiff in this action. The basis for disqualification is related to unethical conduct by Biss and his paralegal and wife Tanya Cornwell (hereinafter "Cornwell") which has invoked the advocate-witness rule, and mandates firm wide disqualification.

Incorporated by reference herein, as if fully set forth herein, are the facts, arguments and exhibits contained within the Declaration of Defendant Goodman.

**STATEMENT OF FACTS****Goodman's Declaration**

In support of the instant Motion to disqualify, Defendant Goodman respectfully submits the following Declaration, along with corresponding exhibits, that detail the factual history relevant to this motion.

Robert David Steele, (hereinafter "Plaintiff" or "Steele") Counsel for Plaintiff, Steven S. Biss, (hereinafter "Biss") his paralegal and wife Tanya Cornwell (hereinafter "Cornwell"), denied intervenor applicant David George Sweigert (hereinafter "Sweigert"), his brother George Webb Sweigert (hereinafter "Webb") and an individual named Manuel Chavez III (hereinafter "Chavez") have conspired with one another as well as others to bring about this instant legal matter in conjunction with additional lawsuits in foreign jurisdictions in order to harass, defame and otherwise disrupt the business and day to day activities of the Defendant Goodman. Biss and his wife Cornwell engaged in unethical conduct by participating in the formulation and execution of a plan to bring multiple civil lawsuits against the Defendant in jurisdictions around the United States. Biss' wife is heavily involved in the conspiracy theorist online community and by Biss' own admission she donates money to "truthers" and "conspiracy theorist" channels she enjoys, all over the internet. Both Plaintiff and Cornwell paid money to Chavez while encouraging him to bring suit against Goodman for unsubstantiated and baseless claims in a scheme to extort \$500,000 (five hundred thousand dollars) from Goodman. In support of this scheme Chavez was encouraged by Plaintiff to produce false evidence against Defendant and to supply this evidence to Biss for use in this instant legal matter in exchange for a percentage of anticipated monetary award from this lawsuit. This is not only a breach of the Virginia State Bar Association's rules

DEFENDANT'S MEMORANDUM IN SUPPORT OF MOTION TO DISQUALIFY COUNSEL FOR PLAINTIFF

1 of professional conduct, it is a violation of Virginia law Article 4 § 18.2-452 Barratry unlawful, a  
2 misdemeanor crime carrying a penalty up to \$10,000 (ten thousand dollars).

3 In furtherance of the plan to overwhelm Goodman with fraudulent legal action, Cornwell,  
4 Biss' wife and paralegal, paid Chavez at least \$1500 (one thousand five hundred dollars) via the  
5 online service Patreon.com using the screen name AMABISS (**EXHIBIT A**) while aggressively  
6 recommending Chavez file suit against Goodman. Cornwell goes as far as explicitly telling  
7 Chavez she is writing lawsuits for her husband; she is acting on behalf of Biss, the two act as  
8 one. This is a clear violation of VA Rules of Professional Conduct Rule 3.4 (j) which states a  
9 lawyer shall not "file a suit, initiate criminal charges, assert a position, conduct a defense, delay a  
10 trial, or take other action on behalf of the client when the lawyer knows or when it is obvious that  
11 such action would serve merely to harass or maliciously injure another."  
12

13 In an email dated December 2, 2017 Plaintiff offers Chavez \$200 to become his  
14 webmaster (**EXHIBIT B**). In an even more shocking email dated October 22, 2017 (**EXHIBIT**  
15 **C**) Plaintiff writes "email to biss by tomorrow 0900 eastern detailing what you have collected  
16 that connects Goodman to Brock and Arnon Milchan. feel free to tell him you want to support  
17 my case in return for a percentage."  
18

19 In this one email Plaintiff exposes the essence of the scheme. Plaintiff openly accepts  
20 false and fabricated evidence from Chavez claiming Goodman is somehow connected with two  
21 individuals Goodman does not know, has never met and is not employed by. Plaintiff entices  
22 Chavez to participate in the scheme, instructing Chavez to contact Biss and provide false  
23 evidence for the fraudulent lawsuit with the offer of a "percentage" ostensibly of the money  
24 Plaintiff intends to extort from Defendant.  
25

26  
27  
28 DEFENDANT'S MEMORANDUM IN SUPPORT OF MOTION TO DISQUALIFY COUNSEL FOR PLAINTIFF

1 At all material times, Cornwell was taking actions in furtherance of the conspiracy,  
2 including financing the same. Cornwell committed overt acts in furtherance of the conspiracy,  
3 including but not limited to following through on her promise to write a Complaint for Chavez  
4 after completing payments to him of \$1500 (one thousand five hundred dollars). (EXHIBIT D)  
5 Cornwell's Complaint alleged Goodman had contacted Chavez' employer demanding Chavez be  
6 fired, resulting in an alleged wrongful termination. This is a false claim that is unsupported by  
7 facts or evidence. Knowing this, and perhaps fearing exposure to countersuit, Chavez chose to  
8 let the statute of limitations run and against the wishes of Steele, Cornwell and Biss, failed to file  
9 suit against Defendant.  
10

11 On or around July 2019, Chavez had allegedly become disillusioned with the members of  
12 this conspiracy. Chavez approached Defendant volunteering to provide emails between himself  
13 and Biss, himself and the Plaintiff and himself and Cornwell among others. These emails  
14 implicate each of them in the conspiracy. In an email provided by Chavez to Defendant, dated  
15 July 2, 2017 (EXHIBIT E) Cornwell attempts to convince Chavez to sue Defendant based on  
16 the false claim. Cornwell writes, *"I'm sitting here writing defamation cases for my husband for*  
17 *policemen and thinking I can in three days get you a case against Jason. I'm guessing a half a*  
18 *million bucks they will throw at you to just make it go away = catch it! Robert is the real deal he*  
19 *can go to court for you."* When Cornwell refers to "Jason" she is referring to Defendant  
20 Goodman. When Cornwell refers to "Robert" she is indicating Plaintiff Steele. This email  
21 correspondence between Cornwell and Chavez should be exempt from the hearsay exclusion  
22 under FRE Rule 804 (b)(3)(A) and (B) as they contain statements against the declarants' interests  
23 and, corroborating circumstances have indicated the trustworthiness of the information they  
24 convey. Cornwell must be called as a witness to testify in regard to the email correspondence.  
25  
26  
27  
28



1  
2 In an email provided by Chavez to Defendant, dated December 11, 2017 **(EXHIBIT F)**  
3 Biss contacts prominent YouTube conspiracy theorist Chavez during the time Chavez was  
4 receiving payments from Biss' own wife and Biss' own client, the Plaintiff Steele. Biss also  
5 includes a person believed to be Thomas Schoenberger (hereinafter "Shoenberger") in the  
6 correspondence. The subject of the message is "*Negron's New #*". The message includes the  
7 number "*617-287-8365*". The public database [www.beenverified.com](http://www.beenverified.com) confirms that this  
8 number is in fact associated with co-Defendant Negron. **(EXHIBIT G)**  
9

10 The correspondence initiated by Biss shows intent to improperly contact and / or  
11 influence co-Defendant Negron and is a direct violation of the Virginia Rules of Professional  
12 Conduct RULE 4.2 regarding Communication With Persons Represented By Counsel. If this is  
13 not a direct violation, it is certainly an underhanded attempt to circumvent the purpose of this  
14 rule and yet another gross demonstration of unethical conduct by Biss. This is also another overt  
15 act on Biss' part in furtherance of the conspiracy. This legal matter was well underway by  
16 December 11, 2017 and Negron was represented by council at that time.  
17

18 In response to Biss emailing Negron's phone number to the two YouTubers, Shoenberger  
19 replies "*Trish the Flip comes soon*" a play on Negron's YouTube nickname "Trish the Dish"  
20 and a possible slang term referencing a preconceived plan to incite Negron to work against  
21 Goodman, join their conspiracy and disrupt Goodman's legal defense. This email  
22 correspondence between Biss, Chavez and Shoenberger should be exempt from the hearsay  
23 exclusion because it contains Biss' email signature block and according to FRE 902(13)  
24 Business signature blocks in emails may count as self-authenticating trade inscriptions for  
25 purposes of federal evidence. These email correspondences should also be excluded under FRE  
26  
27  
28 DEFENDANT'S MEMORANDUM IN SUPPORT OF MOTION TO DISQUALIFY COUNSEL FOR PLAINTIFF

1 Rule 804 (b)(3)(A) and (B) as they contain statements against the declarants' interests and,  
2 corroborating circumstances have indicated the trustworthiness of the information they convey.

3 Approximately one month after this email correspondence intended to recruit Negron, on  
4 January 16, 2018 Negron interviewed an individual believed to be Timothy Charles Holmseth  
5 (hereinafter "Holmseth") on a fringe internet radio broadcast she co-hosts called "Focus on the  
6 Facts" <https://focusonthefacts.podbean.com/c/focus-on-the-facts-011618>. In the broadcast,  
7 Negron focuses not on facts, but on Holmseth's unsubstantiated and unproven theories  
8 implicating United States Vice President Michael Pence and others in involvement with child  
9 trafficking. No evidence is presented to support Holmseth's claims. Holmseth only makes  
10 references to recordings of hearsay testimony; his own writings and law enforcement reports he  
11 had filed himself.  
12

13  
14 Two weeks prior to his appearance as a guest on Negron's radio broadcast, Holmseth was  
15 featured in an article on Plaintiff's website ([https://phibetaiota.net/2018/01/timothy-charles-  
16 holmseth-mike-pence-pam-bondi-in-willful-obvious-defiance-of-presidential-order-on-child-  
17 trafficking/](https://phibetaiota.net/2018/01/timothy-charles-holmseth-mike-pence-pam-bondi-in-willful-obvious-defiance-of-presidential-order-on-child-trafficking/)) Plaintiff's article highlighted the same theories accusing Vice President Pence of  
18 participating in crimes and presenting no factual evidence at all. During a Skype video call  
19 approximately six months prior on June 13, 2017 with Goodman, Negron, Webb and Plaintiff,  
20 Steele made substantially the same claim, stating his belief that *"I expect four GOP senators two  
21 GOP governors and possibly vice president Mike Pence to go down for pedophilia in the next  
22 year."* No evidence that could reasonably link the Vice President to any such activity has come  
23 forward to the public in more than two years since that statement was made. There is no  
24 indication that this claim was anything other than pure fabrication on the Plaintiff's part, or  
25 perhaps Holmseth's or perhaps a third-party mutual contact.  
26

27  
28 DEFENDANT'S MEMORANDUM IN SUPPORT OF MOTION TO DISQUALIFY COUNSEL FOR PLAINTIFF

1 The coincident timing and similar nature of the messages being broadcast by Steele,  
2 Holmseth and Negron, when viewed in the context of Biss' email correspondence with well  
3 know YouTube conspiracy theorists cause Defendant to believe that "Trish the Flip" as  
4 Shoenberger suggested, occurred in January of 2018. Negron began conspiring with Holmseth,  
5 creating additional broadcasts in furtherance of a smear campaign that appears sympathetic to the  
6 interests of Plaintiff in spreading false allegations to damage the reputation of the Vice President  
7 of the United States and others. Negron created multiple broadcasts with Holmseth on the  
8 Russian social media platform, www.vk.com which notably is outside the jurisdiction of U.S.  
9 District Courts' subpoena power.  
10

11 Defendant asks the Court to take notice that during the course of fundraising for Plaintiff  
12 Steele's 501(c)(3) Earth Intelligence Network, including during the June 13 broadcast with  
13 Defendant at issue in this instant legal matter, Plaintiff Steele has repeated these disparaging,  
14 unproven claims against the Vice President, while advocating for U.S. President Donald Trump  
15 to replace Mike Pence with former Georgia Congressional Representative Cynthia McKinney as  
16 his Vice-Presidential running mate in the 2020 election. The IRS has very clear and stringent  
17 guidelines prohibiting 501(c)(3) tax exempt organizations from participating in politically  
18 partisan activities such as advocating for or against any political candidate.  
19 ([https://www.irs.gov/charities-non-profits/charitable-organizations/the-restriction-of-political-](https://www.irs.gov/charities-non-profits/charitable-organizations/the-restriction-of-political-campaign-intervention-by-section-501c3-tax-exempt-organizations)  
20 [campaign-intervention-by-section-501c3-tax-exempt-organizations](https://www.irs.gov/charities-non-profits/charitable-organizations/the-restriction-of-political-campaign-intervention-by-section-501c3-tax-exempt-organizations)). Internal Revenue Code  
21 clearly states "*all section 501(c)(3) organizations are absolutely prohibited from directly or*  
22 *indirectly participating in, or intervening in, any political campaign on behalf of (or in*  
23 *opposition to) any candidate for elective public office. Contributions to political campaign funds*  
24 *or public statements of position (verbal or written) made on behalf of the organization in favor of*  
25  
26  
27  
28 DEFENDANT'S MEMORANDUM IN SUPPORT OF MOTION TO DISQUALIFY COUNSEL FOR PLAINTIFF

1 or in opposition to any candidate for public office clearly violate the prohibition against political  
2 campaign activity. Violating this prohibition may result in denial or revocation of tax-exempt  
3 status and the imposition of certain excise taxes.”

4 The most troubling aspect of the relationship the co-conspirators have with Holmseth,  
5 pertains to a lawsuit filed by Biss on behalf of Holmseth against Florida attorney Kim Picazio  
6 (hereinafter “Picazio”) and an individual William Murtaugh (hereinafter “Murtaugh”) on May  
7 25, 2018 (**EXHIBIT H**). Negron continued to do several additional broadcasts with Holmseth  
8 on her alt-right fringe radio show as well as on VK.com after January 16, 2018. Given the level  
9 of scrutiny Plaintiff and his “legal team” have demonstrated with regard to social media posts  
10 from Defendant and Co-Defendants throughout this matter, it is extremely difficult to imagine  
11 that Plaintiff or Biss would be unaware of the existing relationship between Holmseth and  
12 Negron. Likewise, it is difficult to imagine Negron being unaware that Holmseth was  
13 represented by Biss.

14 These unlikely coincidences indicate that there is a deeper relationship between the  
15 Plaintiff, Biss, Negron, Webb, Sweigert, Chavez, Shoenberger, Cornwell, Holmseth and others.  
16 It is Defendant’s belief that these parties knew each other and were in communication having  
17 conspired “ab initio” to bring multiple suits against Goodman, with the specific intent to  
18 logistically and financially overwhelm him, extort huge sums of money from him and chill his  
19 journalistic efforts.

20 Biss and his law firm should be disqualified so he may be called as a witness and cross  
21 examined under oath with regard to these claims.

22 It is imperative that Biss be called as a witness in order to learn the true nature of the  
23 relationship between Plaintiff, co-defendants and other clients of Biss. Furthermore, his wife and  
24 DEFENDANT’S MEMORANDUM IN SUPPORT OF MOTION TO DISQUALIFY COUNSEL FOR PLAINTIFF

1 paralegal Cornwell, must be called as a witness to be crossed examined under oath and to learn  
2 the true nature and extent of payments made and other enticements offered to conspiracy  
3 theorists on YouTube. Without the ability to conduct discovery on both Biss and his wife,  
4 Defendant would be severely prejudiced and inadequately equipped to defend against allegations  
5 in the complaint. Biss and his wife have directedly inserted themselves into the root cause of this  
6 instant legal matter. The two have acted as one to conspire with others, deliberately stirring up  
7 litigation and financing YouTube channels that cyberstalk and defame Defendant. Individuals  
8 including clients of Biss and Biss himself appear on YouTube broadcasts intended to defame  
9 Defendant.  
10 Defendant.

## 11 LEGAL STANDARDS

### 12 A. Attorney Disqualification

13 The decision to disqualify a Plaintiff's chosen counsel is a serious matter and must  
14 be decided on a case-by-case basis. "In determining whether to disqualify counsel ... the trial  
15 court is not to weigh the circumstances 'with hair-splitting nicety' but, in the proper exercise of  
16 its supervisory power over the members of the bar and with a view of preventing 'the appearance  
17 of impropriety,' it is to resolve all doubts in favor of disqualification." United States v. Clarkson,  
18 567 F.2d 270, 273 n. 3 (4th Cir. 1977) (quoting Gas-A-Tron of Arizona v. Union Oil Co. of  
19 California, 534 F.2d 1322, 1324-25 (9th Cir.1976)). This Court is charged to exercise its sound  
20 discretion and determine independently whether the continued representation by counsel impedes  
21 the integrity of the proceedings and whether the attorney should thus be disqualified. Wheat,  
22 U.S. at 161-64, 108 S. Ct. 1692; and see Williams, 81 F.3d at 1324 ("Wheat thus requires a  
23 district court to exercise its own independent judgment as to whether the proceedings are likely to  
24 have the requisite integrity if a particular lawyer is allowed to represent a party. And, it made  
25 DEFENDANT'S MEMORANDUM IN SUPPORT OF MOTION TO DISQUALIFY COUNSEL FOR PLAINTIFF  
26 - 10

1 plain that for this purpose the court must have sufficiently broad discretion to rule without fear  
2 that it is setting itself up for reversal on appeal on right-to-counsel grounds if it disqualifies the  
3 Plaintiff's chosen lawyer, or on ineffective assistance grounds if it permits conflict-infected  
4 representation of the Pl.").

5  
6 Several courts applied a two-prong test to determine whether disqualification is  
7 warranted when the actions by counsel implicate the integrity of the proceedings. See Collins,  
8 920 F.2d at 628-29; United States v. Urbana, 770 F. Supp. 1552, 1557 (S.D.Fla.1991); United  
9 States v. Walton, 703 F. Supp. 75, 77 (S.D.Fla.1988). "First, although there need not be proof of  
10 actual wrongdoing, 'there must be at least a reasonable possibility that some specifically  
11 identifiable impropriety did in fact occur.'" Hobson, 672 F.2d at 828 (citing Woods v. Covington  
12 Co. Bank, 537 F.2d 804, 813 (5th Cir.1976). "Second, 'a court must also find that the likelihood  
13 of public suspicion or obloquy outweighs the social interests which will be served by a lawyer's  
14 continued participation in the case.'" Id.

15  
16 The Eighth Circuit, on the other hand, outlined three competing interests that must  
17 be balanced when deciding whether to disqualify an attorney. See Meat Price Investigators  
18 Assoc'n v. Spencer Foods, Inc., 572 F.2d 163 (8th Cir.1978). These factors are: "(1) the client's  
19 interest in being represented by counsel of its choice; (2) the opposing party's interest in a trial  
20 free from prejudice ...; and (3) the public's interest in the scrupulous administration of justice."  
21 Id. at 165. When examining both approaches, however, the District of Nevada in Faison v.  
22 Thornton, 863 F. Supp. 1204, 1216 (D.Nev.1993), pointed out that "[t]he two standards ... do not  
23 take into consideration the fact that attorneys are officers of the court and have a duty to maintain  
24 the integrity of the profession," and took into account the "extent and nature of an attorney's  
25 misconduct." Id. The Fourth Circuit has not established which of these factors inform the  
26  
27  
28

1 decision of attorney disqualification. This Court, in an exercise of caution, will examine both  
2 approaches.

3  
4 **B. The Virginia Rules of Professional Conduct**

5  
6 The Virginia Rules of Professional Conduct guide this Court's analysis of whether  
7 the impropriety of counsel's actions warrant disqualification. Certain rules of the Virginia Rules  
8 of Professional Conduct are imperative and "failure to comply with an obligation or prohibition  
9 imposed by a Rule is a basis for invoking the disciplinary process." Preamble, Virginia Rules of  
10 Professional Conduct. We have been cautioned, however, to "avoid overly-mechanical adherence  
11 to disciplinary canons at the expense of litigants' rights freely to choose their counsel; and [to]  
12 always remain mindful of the opposing possibility of misuse of disqualification motions for  
13 strategic reasons." *Shaffer v. Farm Fresh, Inc.*, 966 F.2d 142 (4th Cir.1992); see also *Aetna Cas.*  
14 *& Sur. Co. v. United States*, 570 F.2d 1197, 1202 (4th Cir.1978) (quoting a brief by the  
15 Connecticut Bar Association in *International Elecs. Corp. v. Flanzer*, 527 F.2d 1288 (2d  
16 Cir.1975): "It behooves this court, therefore, while mindful of the existing Code, to examine  
17 afresh the problems sought to be met by the Code, to weigh for itself what those problems are,  
18 how real in the practical world they are in fact, and whether a mechanical and didactic  
19 application of the Code to all situations automatically might not be productive of more harm than  
20 good, by requiring the client and the judicial system to sacrifice more than the value of the  
21 presumed benefits.").

22  
23 The Court will, therefore, examine the facts of this case in light of what the  
24 disciplinary rules require but its analysis will not end there. Upon finding whether there was a  
25 violation of the applicable disciplinary rules, this Court will balance the Plaintiff's right to  
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1 counsel with the interest of preserving the integrity of the judicial system while taking into  
2 account whether practical considerations of and alternatives to disqualification weigh against  
3 disqualification.  
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28 DEFENDANT'S MEMORANDUM IN SUPPORT OF MOTION TO DISQUALIFY COUNSEL FOR PLAINTIFF  
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1 **ARGUMENT**

2 **I. Steven S. Biss and his Law Firm Should Be Disqualified Under the Advocate-**  
3 **Witness Rule**

4  
5 1. Rule 3.7 Lawyer as Witness

6 Rule 3.7 of the Virginia Rules of Professional Conduct provides that:

7 (a) A lawyer shall not act as an advocate in an adversarial proceeding in which the  
8 lawyer is likely to be a necessary witness [4] except where:

- 9 (1) the testimony relates to an uncontested issue;  
10 (2) the testimony relates to the nature and value of legal services rendered in  
11 the case; or  
12 (3) disqualification of the lawyer would work substantial hardship on the  
13 client.  
14

15 Va. Rules of Prof. Conduct, Rule 3.7 (2000). The Fourth Circuit holds that "[t]he roles of witness  
16 and advocate are fundamentally inconsistent and when ... a lawyer ought to testify as a witness  
17 for his client, he must as a rule withdraw from advocacy." *International Woodworkers of Am. v.*  
18 *Chesapeake Bay Plywood Corp.*, 659 F.2d 1259, 1272 (4th Cir.1980) (citing *Ethical*  
19 *Consideration* (EC) 5-9). "Where the question arises, doubts should be resolved in favor of the  
20 lawyer testifying and against his becoming or continuing as an advocate." *Id.* (quoting EC 5-10).  
21 An actual conflict of interest exists when the attorney had independent information about facts in  
22 controversy relating to his client and would, therefore, be faced with the possibility of testifying.  
23 See *Urbana*, 770 F. Supp. at 1559 (finding an actual conflict where defense counsel could "offer  
24 testimony severely undermining the credibility of the government's star witness" and  
25

26 "[i]nasmuch [the attorney] can offer testimony about material issues in the case, he is precluded  
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28 DEFENDANT'S MEMORANDUM IN SUPPORT OF MOTION TO DISQUALIFY COUNSEL FOR PLAINTIFF  
- 14

1 from appearing as trial counsel"). In general, a lawyer may not serve as a trial advocate and as a  
2 witness in the same trial. Rule 3.7 of the VA Rules codifies this restriction. The restriction  
3 protects against multiple harms. The Second Circuit explained in *Murray v. Metropolitan Life*  
4 *Ins. Co.*, 583 F.3d 173, 178 (2d Cir. 2009):  
5  
6 Rule 3.7(a) seeks to mitigate the possibility that: (1) the lawyer might appear to vouch for his  
7 own credibility; (2) the lawyer's testimony might place opposing counsel in a difficult position  
8 when he has to cross-examine his lawyer- adversary and attempt to impeach his credibility; (3)  
9 some may fear that the testifying attorney is distorting the truth as a result of bias in favor of his  
10 client; and (4) when an individual assumes the role of advocate and witness both, the line  
11 between argument and evidence may be blurred, and the jury confused.

13 A lawyer's disqualification under Rule 3.7 is not necessarily imputed to the lawyer's firm.  
14 However, under Rule 3.7(b), other lawyers of the lawyer-witness's firm are forbidden from  
15 serving as advocates at trial if "it is apparent that the testimony may be prejudicial to the client."  
16 The Second Circuit has identified the test as follows: "[A] law firm can be disqualified by  
17 imputation only if the movant proves by clear and convincing evidence that [A] the witness will  
18 provide testimony prejudicial to the client, and [B] the integrity of the judicial system will suffer  
19 as a result." *Murray v. Metropolitan Life Ins. Co.*, supra, 583 F.3d at 178-79. Further, "  
20 [p]rejudice' in this context means testimony that is 'sufficiently adverse to the factual assertions  
21 or account of events offered on behalf of the client, such that the bar or the client might have an  
22 interest in the lawyer's independence in discrediting that testimony.'" *Id* at 178 (citation omitted).

25 Disqualification motions under Rule 3.7 are often considered to be premature at the  
26 outset of a lawsuit, because it is often hard to know before depositions are taken whether a  
27 lawyer will be a necessary witness. But that is not always the case. See, e.g., *Decker v. Nagel*  
28  
DEFENDANT'S MEMORANDUM IN SUPPORT OF MOTION TO DISQUALIFY COUNSEL FOR PLAINTIFF  
- 15

1 Rice LLC, 716 F. Supp. 2d 228, 231-32 (S.D.N.Y. 2010) (denying pro hac vice motion based in  
2 part on Rule 3.7).

3 Biss and his wife and paralegal Cornwell, appear to be interested parties and fact  
4 witnesses to the fundamental claims brought by the Plaintiff in this case. Biss and Cornwell  
5 must be called to testify about these matters.  
6

7 **II. Steven S. Biss Should Be Disqualified for Violating Rule 4.2**

8 Rule 4.2 of the Virginia Rules of Professional Conduct requires that: "In  
9 representing a client, a lawyer shall not communicate about the subject of the representation with  
10 a person the lawyer knows to be represented by another lawyer in the matter, unless the lawyer  
11 has the consent of the other lawyer or is authorized by law to do so." Va. Rules of Prof. Conduct,  
12 Rule 4.2 (2000). Comment 5a enlightens the reasoning behind the prohibition, noting that  
13 "concerns regarding the need to protect uncounseled persons against the wiles of opposing  
14 counsel and preserving the attorney-client relationship may also be involved where a person is a  
15 target of a criminal investigation, knows this, and has retained counsel to receive advice with  
16 respect to the investigation. The same concerns may be involved where a 'third party' witness  
17 furnishes testimony in an investigation or proceeding, and although not a formal party, has  
18 decided to retain counsel to receive advice with respect thereto." Id. at Rule 4.2, cmt. 5a. The  
19 email correspondence with Chavez and Shoenberger regarding co-Defendant Negron  
20 demonstrates malicious intent to interfere with the outcome of this case.  
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1           **III. THIS COURT HAS BROAD AUTHORITY TO DISQUALIFY STEVEN S.**  
2                   **BISS AS COUNSEL IN THIS MATTER AND SHOULD DO SO WHERE**  
3                   **ANY DOUBT EXISTS AS TO AN ATTORNEYS' COMPLIANCE WITH**  
4                   **ETHICAL DUTIES.**

5           The "authority of federal courts to disqualify attorneys derives from their inherent  
6 power to 'preserve the integrity of the adversary process.' *Hempstead Video, Inc. v. Inc. Vill. of*  
7 *Valley Stream*, 409 F.3d 127, 132 (2ND Cir. 2005). Thus, a court "should not hesitate" to  
8 disqualify counsel "if there be any doubt regarding counsel's ability to fulfill counsel's ethical  
9 obligations." *World Food Sys., Inc. v. Bid Holdings, Ltd.*, No. 98 CIV 8515 VM KNF, 2001 WL  
10 246372 (S.D.N.Y. 2001); *Evans v. Artek Sys. Corp.*, 715 F.2d 788, 791 (2ND Cir. 1983) ("we  
11 have not hesitated to disqualify counsel when the circumstances warranted it"); *Glacken v. Inc.*  
12 *Village of Freeport*, CIV No. 09-4832 (DRH)(AKT), 2010 WL 3943527 at \*2 (E.D.N.Y. 2010)  
13 holding disqualification is appropriate "where allowing the representation to continue would  
14 pose a 'significant risk of trial taint.'" quoting *Glueck v. Jonathan Logan, Inc.*, 653 F.2d 746, 748  
15 (2ND Cir. 1981).

16           This Court is vested with the ability to disqualify counsel in this matter because of  
17 violations of the Virginia Rules of Professional Conduct.

18           **IV. STEVEN S. BISS MUST BE DISQUALIFIED BECAUSE OF THE**  
19                   **ADVOCATE-WITNESS RULE BEING IMPUTED TO HIS FIRM IN ITS**  
20                   **ENTIRETY**

21           Defendant expects to call Biss (who signed and inferably drafted the Complaint in this  
22 action) and Cornwell, to impeach their own client's testimony, which is so prejudicial to the  
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DEFENDANT'S MEMORANDUM IN SUPPORT OF MOTION TO DISQUALIFY COUNSEL FOR PLAINTIFF

1 Plaintiff that Biss must be disqualified. "A lawyer may not both appear for and oppose a client  
2 on substantially related matters when the client's interests are averse" *Sheldon Solow v. WR.*  
3 *Grace & Co.*, 83 N.Y.2d 303 (1994). Here, as stated more fully in the Defendant's Declaration,  
4 Defendant intends to call, Biss and Cornwell as witnesses at trial in this matter. It is expected,  
5 that if testifying truthfully, these witnesses will offer testimony adverse and prejudicial to their  
6 own client, Steele. The very existence of this lawsuit implicates the need for disqualification of  
7 Biss. In such cases, "a law firm can be disqualified by imputation ... when the clear convincing  
8 evidence shows; "[A] the witness will provide testimony prejudicial to the client, and [B] the  
9 integrity of the judicial system will suffer as a result." *Murray v. Metro Life*, 583 F.3d at 178-79  
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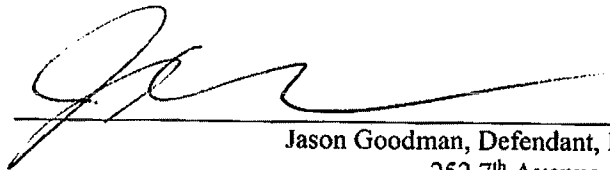
1 **CONCLUSION**

2 WHEREFORE, for the foregoing reasons, Defendant respectfully requests that  
3 the Court grant this Motion to Disqualify in its entirety and enter an Order disqualifying Steven  
4 S. Biss as counsel for the Plaintiff Robert David Steele, pursuant to, (a) Rules 3.7(b)[1] and [2] of  
5 the Virginia Rules of Professional Conduct pursuant to Rule 3.7(a) of the Virginia Rules of  
6 Professional Conduct; (b) pursuant to Rule 4.2 of the Virginia Rules of Professional conduct; (c)  
7 pursuant to the discretionary power of this Respected Court to order disqualification; and (d) for  
8 such other and further relief as to the Court may deem just and proper.  
9  
10

11 I hereby attest that the pleadings herein are accurate and true under penalties of perjury.  
12 Further, I hereby attest that the attached exhibits are accurate and true copies of source  
13 documents as described.  
14

15 Signed this 26<sup>th</sup> day of November 2019  
16

17  
18 Respectfully submitted,

19  
20 

21 Jason Goodman, Defendant, Pro Se  
22 252 7<sup>th</sup> Avenue Apt 6s  
23 New York, NY 10001  
24 (323) 744-7594  
25 [truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)  
26  
27

<b>Circuit Court for</b> <u>Eastern Division Virginia</u>				<b>Case No.</b> <u>3:17-cv-601-MHL</u>					
				<b>City or County</b>					
Robert David Steele and Earth Intelligence Network				Jason Goodman					
<b>Name</b>				<b>Name</b>					
11005 LANGTON ARMS CT				252 7th avenue					
				<b>6s</b>					
<b>Street Address</b>				<b>Street Address</b>					
<b>Apt #</b>				<b>Apt #</b>					
OAKTON,	VA	22124	( 571 )	320-8673	New York	NY	10001	( 323 )	744-7594
<b>City</b>	<b>State</b>	<b>Zip Code</b>	<b>Area Code</b>	<b>Telephone</b>	<b>City</b>	<b>State</b>	<b>Zip Code</b>	<b>Area Code</b>	<b>Telephone</b>
<b>Plaintiff</b>				<b>Defendant</b>					

**CERTIFICATE OF SERVICE**  
**(DOMREL58)**

I HEREBY CERTIFY that on this 26 day of November, 2019, a copy  
of the document(s) entitled Motion to Disqualify Counsel for Plaintiff

**Title of Document(s)**  
was/were mailed, postage prepaid to:

Steven S Biss

Opposing Party or His/Her Attorney

300 West Main Street Suite 102

**Address**

Charlottesville VA 22903  
**City** **State** **Zip**

November 26, 2019  
**Date**

  
**Signature**

<b>Circuit Court for</b> <u>Eastern Division Virginia</u>		<b>Case No.</b> <u>3:17-cv-601-MHL</u>	
		<b>City or County</b>	
Robert David Steele and Earth Intelligence Networ			
<b>Name</b>		Jason Goodman	
11005 LANGTON ARMS CT		252 7th avenue	
<b>Street Address</b>		<b>Street Address</b>	
<b>Apt. #</b>		<b>Apt. #</b>	
OAKTON,	VA	22124	( 571 ) 320-8573
New York	NY	10001	( 323 ) 744-7594
<b>City</b>	<b>State</b>	<b>Zip Code</b>	<b>Area Telephone</b>
		<b>Code</b>	
<b>Plaintiff</b>		<b>Defendant</b>	

**CERTIFICATE OF SERVICE**  
**(DOMREL58)**

I HEREBY CERTIFY that on this 26 day of November, 2019, a copy  
of the document(s) entitled Motion to Disqualify Counsel for Plaintiff

**Title of Document(s)**  
was/were mailed, postage prepaid to:

Terry Frank Kaufman & Canoles

Opposing Party or His/Her Attorney

1021 E. Cary Street, 14th Floor

**Address**

Richmond VA 23219

**City**

**State**

**Zip**

November 26, 2019  
**Date**

  
**Signature**



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
\_\_\_\_\_  
DIVISION

ROBERT DAVID STEELE, et al.,  
\_\_\_\_\_

Plaintiff(s),

v.

Civil Action Number: 3:17-cv-00601-MHL

JASON GOODMAN, et al.,  
\_\_\_\_\_

Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

Motion to Disqualify Counsel for Plaintiff

No attorney has prepared, or assisted in the preparation of \_\_\_\_\_

JASON GOODMAN

Name of *Pro Se* Party (Print or Type) \_\_\_\_\_

  
\_\_\_\_\_  
Signature of *Pro Se* Party

Executed on: November 26, 2019 (Date)

OR

The following attorney(s) prepared or assisted me in preparation of \_\_\_\_\_  
(Title of Document)

\_\_\_\_\_  
(Name of Attorney)

\_\_\_\_\_  
(Address of Attorney)

\_\_\_\_\_  
(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document

\_\_\_\_\_  
(Name of *Pro Se* Party (Print or Type)

\_\_\_\_\_  
Signature of *Pro Se* Party

Executed on: \_\_\_\_\_ (Date)

**(EXHIBIT D)**

D.G. Sweigert, c/o  
P.O. Box 152  
Mesa, AZ 85211  
[Spoliation-notice@mailbox.org](mailto:Spoliation-notice@mailbox.org)

Feb. 22, 2019

Capt. Jason Tama, USCG  
Captain of the Port  
USCG Sector New York  
212 Coast Guard Dr.  
Staten Island, NY 10305

**SUBJ: Closure of the Port of Charleston, June 14<sup>th</sup>, 2017**

Captain:

As you may be aware, the true target of a dirty bomb hoax appears to be the Port of New York and New Jersey (N.Y./N.J.). New evidence available via open sourced intelligence (OSINT) (in social media) provides indicators about the true intended target of the dirty bomb hoax of June 14<sup>th</sup>, 2017 was not the Port of Charleston, South Carolina.

The apparent terrorist-style controllers of the event (alleged to be Jason David Goodman and George Webb Sweigert) were misinformed about the position of the MEMPHIS MAERSK container ship and executed their "cyber-attack" a day late. Based on the totality of newer OSINT evidence, it appears when Goodman/Sweigert learned that the MEMPHIS MAERSK was underway to the Port of Charleston that port became the new target of opportunity.

Therefore, it may be prudent to reopen the investigation by the U.S. Coast Guard, which (according to press releases at that time) was immediately turned over to other law enforcement organizations with limited knowledge in maritime affairs and port security.

Warm regards,

  
D. G. Sweigert

Copies provided:

Michael Farbiarz, esq.  
Chief Legal Counsel  
The Port Authority of  
New York and New Jersey  
4 World Trade Center  
150 Greenwich Street  
New York, NY 10007

Mr. Nils Smedegaard Anderson  
Chief Executive Officer  
MAERSK, INC.  
180 Park Ave  
Building 105  
P.O. Box 950  
Florham Park, NJ 07932

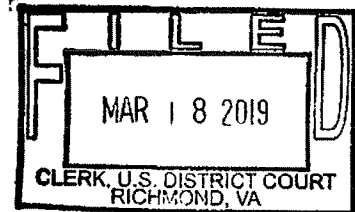
Threat Analysis Unit (ROIC)  
Office of the NJ  
Regional Operations Intelligence Center  
PO Box 7068  
West Trenton, NJ 08628

Craig Carpenito  
U.S. Attorney  
U.S. Attorney's Office  
970 Broad Street, 7th Floor  
Newark, NJ 07102

JASON GOODMAN, CEO  
Multimedia Systems Designs, Inc.  
252 7<sup>th</sup> Avenue, APT #6S  
New York, NY 10001

**(EXHIBIT E)**

**Steve Outtrim  
90 Franklin Rd  
Freemans Bay  
Auckland 1011  
New Zealand**



<b>IN THE MATTER OF:</b>  <b>ROBERT D. STEELE</b>  <b>vs.</b>  <b>JASON GOODMAN</b>	<b>District Judge M. Hannah Lauck</b>  <b>#: 3:17-cv-00601-MHL</b>  <b>STATEMENT IN RESPONSE TO</b> <b>"DEFENDANT'S OPPOSITION TO THE</b> <b>MOTION TO INTERVENE" BY NON-PARTY</b>
---	--

**STATEMENT IN RESPONSE TO "DEFENDANT'S OPPOSITION TO THE MOTION TO INTERVENE"**

On this day, Tuesday, March 12, 2019, I, Steven Outtrim (a non-party), of the address 90 Franklin Rd, Auckland 1011 New Zealand declare that the following statement is true and correct under penalty of perjury.

I am making this statement in response to allegations Defendant Jason Goodman has made about me in a pleading that appears as document no. 78 in the court's record. Specifically Defendant has stated in document no. 78:

- that I am a co-conspirator in a plot against him,
- that I am a participant in a Ponzi scheme using the Steemit.com blogging site, and
- that I am involved with money laundering

These allegations are completely untrue and Mr. Goodman has provided no evidence to support them.

I am a retired businessman from New Zealand. I have started two (2) technology companies which were publicly listed via Initial Public Offerings (IPOs) and two (2) other businesses which were acquired in trade sales. I created applications software which was named by WIRED magazine as the #3 most downloaded software on the Internet in 1997. See **Exhibit A**, Steve Outtrim Wikipedia Page; **Exhibit B**, Steve Outtrim LinkedIn profile. I have lived and worked in California under H1 and E2 visas since 2004, and have resided in New Zealand since July 2017.

I first became aware of Mr. Goodman when he interviewed YouTube presenter George Webb in May 2017. See **Exhibit C**, George Webb/Jason Goodman interview. Mr. Webb was known to me as a promoter of "Fake News" from Russian disinformation web sites like whatdoesitmean.com. Within two (2) weeks of their first televised meeting, Mr. Goodman and Mr. Webb used their live streaming audience to shut down the Port of Charleston with a fake "dirty bomb" hoax. See **Exhibit D**, "Clear and Present Danger" YouTube show. I was watching the stream live and tried to comment in the chat that "dirty bombs" cannot be made from Uranium (see **Exhibit E**, Wikipedia page for Dirty Bomb); however, my messages were deleted.

When Mr. Goodman and his apparent "accomplice" Korey Atkins aka "Quinn Michaels" presented a YouTube show about a secret underground city beneath the site of the festival known as "Burning Man" (see Reno, Nevada), it was claimed by the two that the weight of all the people on the planet was causing the earth's rotation to slow down, and I wrote a post debunking their claims at the steemit.com web site.

<https://steemit.com/truth/@steveouttrim/short-bus-physics-with-quinn-and-j-go>

(Reproduced in **Exhibit F**)

This post received 13 positive votes, earning \$1.48. (See **Exhibit G**)

Two of the votes were from others named as “co-conspirators” by Jason Goodman in court document no. 78: “frankbacon” (Tyroan Simpson) and “defango” (Manuel Chavez III). I have never met either of these people, and both of them have made multiple public statements disparaging me. The suggestion that I would join a criminal conspiracy with my most vocal critics is preposterous, and I deny it emphatically.

The opinions expressed in this blog post were my own. I was not asked to write it or alter it by any person and was not paid money to write it. The nature of the Steemit software, which Mr. Goodman fails to understand despite his claims to have done significant research into the technology, is that “Steem Dollars” are allocated to the people who like a post. The \$1.48 of Steem Dollars generated by the post came after it was published from the votes of people who enjoyed reading it, something entirely out of my control.

In December 2018, I interviewed a former collaborator of Jason Goodman on my podcast (**Exhibit H – Queen Tut Spills the Beans**). Susan Lutzke aka Queen Tut has been named as a co-defendant in this lawsuit and has also been named as a co-conspirator by Defendant Goodman (doc. no. 78). She appeared on dozens of shows on Jason Goodman’s channel and contributed research to him. During this interview (**Exhibit H**), she disclosed that Jason Goodman’s source “Deep Uranium” aka Rock Hudson” aka “Mr Hudson” was actually an FBI informant/provocateur named Okey Marshall Richards, Jr. He was working in close collaboration with Jason Goodman and his accomplice George Webb Sweigert in their “Clear and Present Danger” disinformation operation to shut down the Port of Charleston.

Queen Tut further revealed connections between Mr. Goodman and Aerocine, a corporation that listed Mr. Goodman as the CEO. Aerocine flew advanced imagery drones over the Chernobyl



nuclear site near Kiev, Ukraine, a couple of weeks before the Maidan Revolution broke out there. See **Exhibit I** (Goodman CEO of Aerocine), **Exhibit J** (Goodman presentation on Ukraine drone flight as CEO of Aerocine, two (2) weeks after Maidan Revolution). Mr. Goodman was married to a Ukrainian and appears to speak fluent Russian (**Exhibit K**).

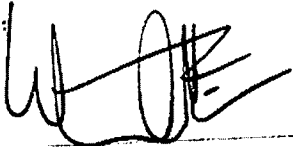
The involvement of Russians and Ukrainians on social media channels in “active measures” disinformation operations, smear campaigns, gang-stalking, and cyber-attacks is of great concern to me. The large number of former CIA, FBI, and military intelligence guests on Mr. Goodman’s channel all tell similar stories that are highly critical of the United States government. Mr. Goodman has promoted content such as how to modify household appliances to create directed energy weapons (**Exhibit L**), which are considered Weapons of Mass Destruction by the U.S. Department of Defense (**Exhibit M**)

Finally, I would like to bring to the Court’s attention a demonstrably false claim made by Mr Goodman (doc. no. 78). He said “Defendant Goodman is not and has never been associated in any way with Mossad, Arnan Milchan or the film director and accused rapist Singer”. This is disproven by Defendant’s own corporate web site, which promoted his association with Singer (**Exhibit N**).

I am one of the pioneers of the World Wide Web and have seen many things happen on the Internet over the last 25 years. Shutting down the 8<sup>th</sup> busiest port in the nation with a crowd-sourced “swarm” attack (Port of Charleston) based on easily debunkable fake news is very alarming, and highlights the vulnerabilities of critical infrastructure to future attacks.

I emphatically deny all of Jason Goodman’s claims about me (doc. no. 78), and would be happy to provide the Court with further information upon request.

Yours truly,

A handwritten signature in black ink, appearing to read 'W. Outtrim', with a horizontal line drawn underneath.

**Steve Outtrim**

I hereby certify (under the penalties of perjury) that the following attached exhibits are true and correct copies of the appropriate screen shots.

Copies forwarded to the following:

**CLERK OF COURT  
United States District Court  
Eastern District of Virginia  
701 E Broad St.  
Richmond, VA 23219  
USA**

**Exhibit A – Steve Outtrim Wikipedia Page**[https://en.wikipedia.org/wiki/Steve\\_Outtrim](https://en.wikipedia.org/wiki/Steve_Outtrim)**Steve Outtrim**

From Wikipedia, the free encyclopedia

(Redirected from [Steve outtrim](#))[Jump to navigation](#)[Jump to search](#)

Steve Outtrim	
<b>Born</b>	1973
<b>Education</b>	Victoria University of Wellington
<b>Occupation</b>	Entrepreneur former CEO of Sausage Software
<b>Years active</b>	1995 - current
<b>Known for</b>	Pioneer / entrepreneur of Sausage software
<b>Website</b>	<a href="http://www.linkedin.com/in/steveouttrim">www.linkedin.com/in/steveouttrim</a>

**Steve Outtrim** (born 1973) is a technology entrepreneur from New Zealand. He is best known for his success in the early "dot com years" of the Internet, as the creator of [Sausage Software](#) and its flagship product, the [HotDog Web Editor](#). He has also founded software company [Urbanise](#)<sup>[1]</sup> and environment solutions company [ekoLiving](#) and is the former owner of [nutraceutical](#) company [Aussie Bodies](#). In 2017 he founded blockchain consulting firm [zMint.co](#) and joined the advisory board of [Etherical](#)<sup>[2]</sup> and [Sheltercoin](#)<sup>[3]</sup>. He is the editor and main writer of [Burners.me](#), a website that discusses [Burning Man](#) culture.<sup>[4]</sup>

**Contents**

- 1Early life and education
- 2First business success
- 3Dot-com pioneer
- 4Current activities
- 5References

**Early life and education**[\[edit\]](#)

Outtrim was born in [Wellington, New Zealand](#) in 1973 and graduated from [Wellington College \(New Zealand\)](#) high school in 1989. By 1992 he had completed a Bachelor of Commerce and Administration (BCA), from [Victoria University of Wellington](#)

**First business success**[\[edit\]](#)

Outtrim founded [Sausage Software](#) in 1995. At that stage of the Internet's development, graphics had only just come to the [World Wide Web](#), with [Marc Andreessen](#)'s breakthrough [NCSA Mosaic](#), which later became [Netscape](#). There were very

few pages with images, and not much search capability. Yahoo was just a list of interesting content, before it was a search engine.

Outtrim wanted to make a Web page and put up a picture of himself and information about the music he liked. He tried using HoTMetaL and Web Edit but was frustrated when both programs crashed with the blue screen of death. He decided he could do a better job himself. He built HotDog, an HTML Authoring tool using Visual Basic.<sup>11</sup> It could write Web pages like a word processor, with a WYSIWYG interface, an auto-save feature and other features designed to make it easy to manage sites with many pages. Steve incorporated easy to use, context sensitive help which the competing programs lacked.<sup>12</sup>

He created his own superdistribution system using cryptography and the Windows Registry. This enabled the business model of Sausage Software, which was to give away something of value for free, but time limit its use to 30 days. This "Free/Pro" distribution model was known as Shareware, and was employed by many small software vendors on the Internet and Bulletin Board Systems (BBS). However very few of them used sophisticated techniques to enforce the 30-day time limit, or electronic direct marketing to convert users from the free version to the paid version.<sup>13</sup>

Sausage Software grew rapidly despite competition from major software houses such as Microsoft, Adobe Systems, Symantec and IBM.<sup>14</sup> In 1997 Wired magazine rated HotDog the No. 3 most popular program on the Internet, after Netscape (browser) and Eudora (mail client).<sup>15 16</sup>

### Dot-com pioneer[edit]

Outtrim was one of the first people to create a successful global e-commerce business on the Internet.<sup>17</sup> Sausage.com was a fully automated business, open 24/7 in every country in the world and with no staff or inventory required to make a sale. Steve employed software developers and customer support staff, who used the internet to rapidly incorporate user suggestions into the product and release them back to the user community. Within a month of launch he had customers in more than 200 different countries. The customers would get the program for free, use it for 30 days, then if they wanted to keep using it, provide their credit card details to a secure web server, and receive an email with a 16-digit licensing code. This code was locked to the user name and email address using a cryptographic hash, to discourage piracy.<sup>18</sup>

Outtrim took Sausage Software public on the Australian Stock Exchange in October 1996. This made him the youngest CEO of a public company in Australia. In 2000 he left the company when it merged with SMS Management and Technology, an IT consulting firm.<sup>19</sup> He reportedly made A\$51 million from the company after selling off large parts of his share before the dot com crash.<sup>14</sup> Outtrim was an early promoter of Java technology from Sun Microsystems, creating the first Java applets to be sold over the Internet<sup>15</sup> and the first Java micropayments system.<sup>19</sup>

### Current activities[edit]

Outtrim left Sausage Software in an executive role in 1999 and departed from the board of directors in 2000.<sup>17</sup>

Since then he has been involved in a number of start-up companies, most notably as:

- Former owner of Aussie Bodies, which was acquired by Healtheries in 2004.<sup>18</sup>
- Founder of software company Majitek, which closed a Series B investment with Cisco Systems in February 2009<sup>19</sup> and opened an office in Dubai.<sup>20</sup>
- Founder and owner of ekoLiving which specialises in environmental technology solutions using software, hardware, and networks. ekoLiving is a pioneer in the emerging field of Smart Environments, which is sometimes referred to as pervasive computing or Ubiquitous computing.<sup>citation needed</sup>
- He created an "energy group" (named eKoSchool) at his former school, Wellington College. The aim of this group is to find ways of reducing energy usage.

In 2014, Majitek changed its name to Urbanise.com and listed on the Australian Stock Exchange (ASX code: UBN). Its technology is being used in the world's 4 tallest buildings. Outtrim stepped down from the Board before the IPO.<sup>21</sup>

In 2017, Steve Outtrim founded zMint to help companies get on the blockchain.<sup>22</sup>

Outtrim is a supporter of the Internet Party as of 2017.<sup>23</sup>

### References[edit]

- <sup>1</sup> Australian Financial Review Sep 2014 "How Small Tech Company Urbanise Tapped Big Asian Money"
- <sup>2</sup> Bitcoin.com Jan 2018 "3D-Token ICO Etherical Invests in Factory 4.0"
- <sup>3</sup> Sheltercoin web site
- <sup>4</sup> Burners.Me Dec 2014 "What's In A Name"
- <sup>5</sup> Borland Delphi News "Sausage dumps 'unstable' Visual Basic, adopts Delphi"
- <sup>6</sup> Smart Computing, October 1997 Editorial.
- <sup>7</sup> ITWire Mar 2008 Be the Next Big Thing in open source Archived 22 November 2008 at the Wayback Machine

8. [^ Computerworld Oct 1997 HotDog still sizzles. Snaglets off menu says Sausage Man Archived 28 September 2011 at the Wayback Machine](#)
9. [^ Wired magazine 5.05 May 1997 Hot Links](#)
10. [^ Atari SIG historical archive Five Days at Computer = \\$7.5 Mil](#)
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12. [^ Sydney Morning Herald April 1996 IRC chat with Steve Outtrim](#)
13. [^ Sausage Software and SMS merger. ZDNet](#)
14. [^ ARNNet Agnes King 3 July 2000 The Sausage maker jumps from barbie to pool](#)
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21. [^ Business Review Weekly 2014 Sausage machine: How former 'dotcom darlings' pulled off Urbanise IPO](#)
22. [^ Stuff.co.nz Dec 2017 "Demystifying Blockchain"](#)
23. [^ Steve Outtrim. "Because it's today, I can tell you that I voted for @InternetPartyNZ . Love their #AntiSpyBill a party with vision".](#)

**Exhibit B - Steve Outtrim LinkedIn Profile**  
<https://www.linkedin.com/in/steveouttrim/>

**Contact**

steveo@ekoliving.com

[www.linkedin.com/in/steveouttrim](http://www.linkedin.com/in/steveouttrim)  
(LinkedIn)  
[www.coitstaffing.com](http://www.coitstaffing.com) (Company)  
[www.majitek.com](http://www.majitek.com) (Other)  
[www.reallocate.org](http://www.reallocate.org) (Other)

**Top Skills**

E-commerce  
Lateral Thinking  
Persistence

## Steve Outtrim

Chairman at zMint Group  
Auckland, New Zealand

### Summary

1993 moved to Australia from Wellington, New Zealand  
1995 founded Sausage Software  
1995 wrote HotDog, easy way to make web sites  
1996 took Sausage Software public: youngest CEO of a public company in Australian history  
1997 HotDog named #3 most popular program on the Internet by Wired Magazine  
1999 Intel, Telstra, St George invest in Sausage Software  
1999 founded private equity company Pagan Investments, triple-bottom line focus  
2000 sold most of stake in Sausage Software  
2000 founded Majitek  
2001 purchased Aussie Bodies; Director  
2004 sold most of Aussie Bodies  
2004-2006 director, Majitek US  
2006 founded ekoLiving.com, Greater Springfield Digital Edge Corporation Pty Ltd  
2007 sold remaining stake in Aussie Bodies  
2007 founded Majitek Middle East  
2009 Cisco invests in Majitek, "Intelligent Urbanization"  
2010 investments in Grid-Net, Nukotoys, RedTXT, Festquest  
2010 joined advisory board, MaestroConference  
2011 Majitek and Emrill (UAE) form partnership  
2011 founding board member of charity Reallocate.org  
2011 Entrepreneur in residence, Coit Group  
2011 joined advisory board, ShopCity.com  
2012 started painting containers: ekoVillages.com  
2012 investment: Socure  
2012 started real estate development, Costa Rica: investment in Puerta La Vida  
2013 first containers deployed, Treasure Island  
2013 shipping containers sent to [freespace]; commendation from Mayor, SF Chronicle  
2013 shipping containers donated to Reallocate, Learning Shelter

2013 investments, Zoom Systems, Startup House, MaxSec (Australia)  
2014 Majitek renamed Urbanise.com, IPO in Australia announced.  
2014 Burj Khalifa and 3 next tallest residential buildings run Urbanise; 100+ skyscrapers  
2014 Stepped down from Urbanise board  
2014 September 22: UBN IPO. 40% first day pop beats Ali Baba (38%)  
2013-2017 shadow history research project  
2017 Investment in Presearch.io  
2017 Moved to Auckland, New Zealand to start zMint  
2017 Advisory Board SHELTERCOIN, Etherical  
2018 Advisory Team NewYorkCoin

---

## Experience

### zMint Group

#### Chairman

July 2017 - Present

Auckland, New Zealand; Tallinn, Estonia

zMint Limited provides software design and consulting for decentralized application development, blockchain, distributed ledger, crypto, digital tokens. zMint Group OO is a government-licensed cryptocurrency wallet and exchange operator.

### New York Coin

#### Member Of The Advisory Team

July 2018 - Present

Greater New York City Area

New York Coin (NYC) launched on March 6th, 2014. Original developer disappeared at launch and is still unknown to this date. NYC is a fair launch cryptocurrency with no pre-mine. NYC is completely open-source code with searchable block explorers. NYC enables a free worldwide network with lightning fast transactions. A worldwide group of dedicated miners have kept the NYC network confirming transactions every 30 seconds for the past 4+ years.

In January 2018, NYC finally got noticed. A worldwide, decentralized group of developers joined the NYC Community and began updating the aging code, nodes and wallets. NYC has begun attracting high-caliber tech talent

from Fortune 100 Companies recently. After nearly 4 years of stagnant development, the NYC Devs have completed core wallet updates, updated nodes, developed Electrum NYC wallets and are currently in the process of implementing a fork to update network security (protect against 51% attacks) and begin block reward halving. The future is bright for NYC.

NYC is a basic money transfer system. No frills, no whitepaper, just the basics that Bitcoin and Litecoin offer. Worldwide, anonymous transfer of funds. NYC just does it faster and does it cheaper. NYC is lightning fast - test it! Unconfirmed transactions worldwide in 1-2 seconds. Confirmations every 30 seconds since 2014. And there are no fees to send funds. Zero fees. NYC offers FREE, lightning-fast worldwide money transfer. NYC is actually usable at the retail level. Bitcoin is not feasible for time-sensitive daily consumer purchases. NYC is simply a more usable version of Bitcoin.

#### **Etherical ZEA**

Founder  
November 2017 - Present  
Estonia, Auckland

Based on the ageless investment philosophy of Buy Low, Sell High, Etherical pools tokens from a decentralized community to exchange for brand new and up-and-coming tokens. Etherical operates multiple portfolios, and pays out ZEA to proof of stake ERC20 wallet holders. Etherical Alpha portfolio pays out with every profitable exit, Bravo portfolio pays out a share of profits each quarter the portfolio grows more than 10%. Etherical's Token Generation Event is being processed by zMint Group OÜ, a government-licensed cryptocurrency exchange. +60% bonus before public sale begins on Sep 23, 2018. For citizens of the United States, New Zealand and Estonia, participation in Etherical is available by application to professional investors and corporations only.

#### **SHELTERCOIN Foundation MTÜ**

Founding Member  
March 2018 - Present  
Tallinn, Estonia

SHLT - SHELTERCOIN is the token for international rescue and disaster response.



We have all seen how a centralized, bureaucratic approach to disaster relief results in a tiny fraction of the money raised from the public actually going to the people in need. We believe there is a better way.

**Urbanise (Majitek, Myretsu, Pagan Labs)**

**Founder**

April 2014 - October 2017 (3 years 7 months)

Majitek renamed Urbanise. The 4 largest residential buildings in the world are all running Urbanise's platform.

Urbanise named 4th fastest growing company in 2015 Deloitte Fast 50

**Reallocate.org**

**Director**

June 2011 - December 2016 (5 years 7 months)

reallocate is a non-profit organization that leverages a volunteer network of high-level technologists, designers, and innovative thinkers to holistically work real-world problems.

reallocate gives experts the structure and means to identify and address issues faced in developing areas in disenfranchised parts of the world.

reallocate is capable of assessing a wide range of problems and executing innovative and effective solutions by dynamically assembling teams of world class talent, and giving them the requisite resources through strategic partnerships and funding.

**ekoLiving**

**Founder and Chairman**

April 2006 - December 2013 (7 years 9 months)

San Francisco Bay Area

Modular, mobile, temporary solutions for housing, office space, emergency relief shelter.

Up-cycled shipping containers. ekoVillages are environmentally friendly and can be deployed worldwide. Building automation, security, systems integration, Internet of Things.

We create smart environments.

**Coit Group**

**Entrepreneur in Residence**

July 2011 - June 2013 (2 years)

Coit Ventures Superincubator helps develop early-stage ideas and companies into sustainable businesses. We add value with strategy, networks, experience, infrastructure, and best practice methodologies. We mentor entrepreneurs and help a small company operate like they're bigger and more established. We accelerate your company's growth and help to fund it through our network of angel and early stage investors.

ekoLiving

Chairman and Founder

April 2006 - June 2011 (5 years 3 months)

Smart Buildings, Smart Cities, Smart Facilities. Specialising in large-scale property developments and assisted living facilities.

We offer Smart Home technology packages that enhance Environmental Efficiency, Convenience, Security, Entertainment, and Lighting systems.

ekoLiving's packages are designed for multi-unit, large-scale, "Smart City" and "Smart Apartment" developments. Specific solutions are also available for Aged Care (Assistive Living Technology), Luxury Villas, campuses, and high-security facilities.

ekoLiving uses globally proven technology like Java, Majitek, LONWorks, eKey, Palladine, Elegine.

Combined with Majitek's world-class software for Digital Service Providers, ekoLiving changes the game for large scale property developments.

FTTP doesn't make a city smart; neither do a bunch of smart meters. A truly smart city requires an integrated network of smart buildings and devices - ekoLiving offers a future-proof, open standards-based solution.

Sausage Software

CEO

1995 - 2000 (6 years)

Founded 95, took public 96: youngest public company CEO at 23, previous record held by Rupert Murdoch since 1950's.

Sausage made Web tools. Most successful product: HotDog, HTML authoring made it easy to create Web pages.

In 1996 Wired Magazine rated HotDog the #3 most popular program on the Internet, after Netscape Navigator (early browser) and Eudora (email).

Sausage Software was early pioneer of Java technology, creating first commercial Java applet (Egor Animator), and the first network based e-commerce micropayment system (eVend).

At its peak Sausage Software had more than 3 million customers in over 200 countries, with a market cap of \$1.7 billion, and 1200+ employees.

IPO investors bought at 75c, shares hit \$8.20. Significant investment was made in Sausage Software by Telstra, Intel and St George Bank.

Steve left as CEO in 1999, and the board in 2000, delivering returns in excess of 300% in < 3 years for shareholders. The company merged with SMX.

Inland Revenue NZ  
Systems Programmer  
1990 - 1992 (3 years)

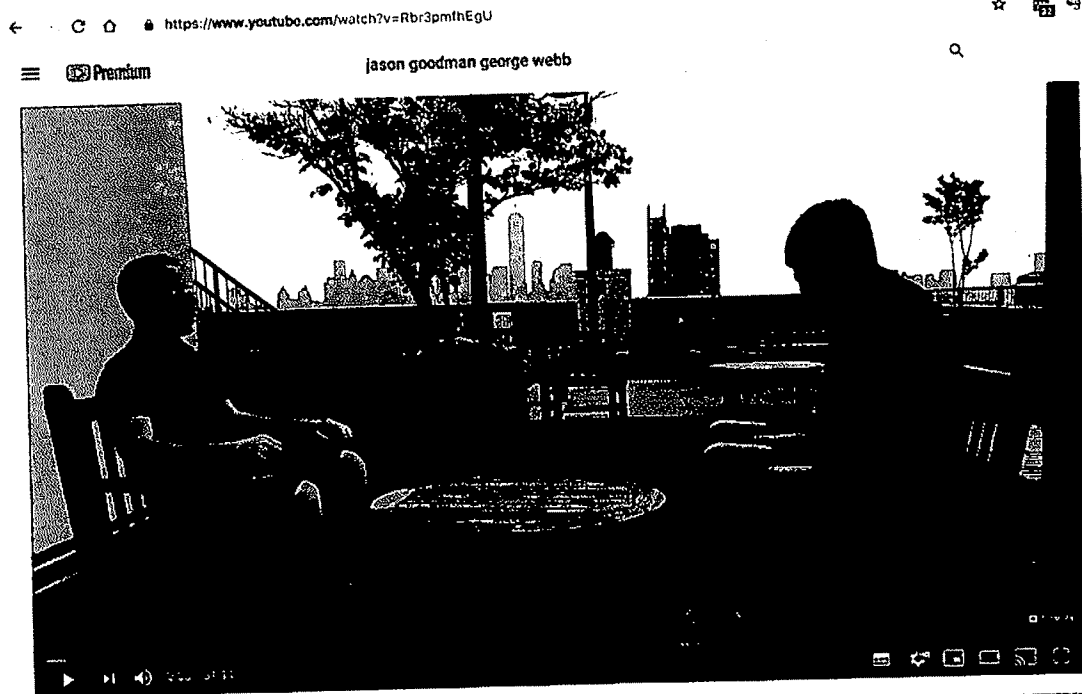
---

## Education

Victoria University of Wellington  
BCA, management, conservation, organisational behaviour · (1990 - 1992)

**Exhibit C, George Webb/Jason Goodman interview May 18 2017**

<https://www.youtube.com/watch?v=Rbr3pmfhEgU>



**Crowdsource the Truth Interviews George Webb Interview 02 - Part 1**

35,752 views

1K 26 SHARE SAVE



**Jason Goodman**  
Published on 30 May 2017

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<http://paypal.me/crowdsourcethetruth>

With Hillary's henchmen closing in on all sides, George and I have temporality split up to do double duty. Brooklyn comedian Johnny B is on the way to help George sidestep SEUI goons at the Brooklyn Marriott and George has insisted that I upload our second interview ASAP. We are in "damn the torpedoes" mode so the video is incomplete, but let's call this Part 1. This was originally recorded on May 18, and lead directly to me joining the investigation full time. It's been a busy two weeks and I have not been able to complete post production, so please refrain from any comments that pertain to technical shortcomings.

**\*\*Legal Disclaimer:** Sponsorship of Crowdsource the Truth is made at the sponsor's sole discretion. Sponsorship funds are not tax-deductible, are non-refundable, and do not represent any ownership, equity interest or decision-making authority in the organization.

**Exhibit D – Clear and Present Danger (Calm Before The Storm?) #maerskmemphis YouTube Episode 14 Jun 2017**

<https://www.youtube.com/watch?v=ekr5cw2WAbU>



**Clear and Present Danger (Calm Before the Storm?) #maerskmemphis**

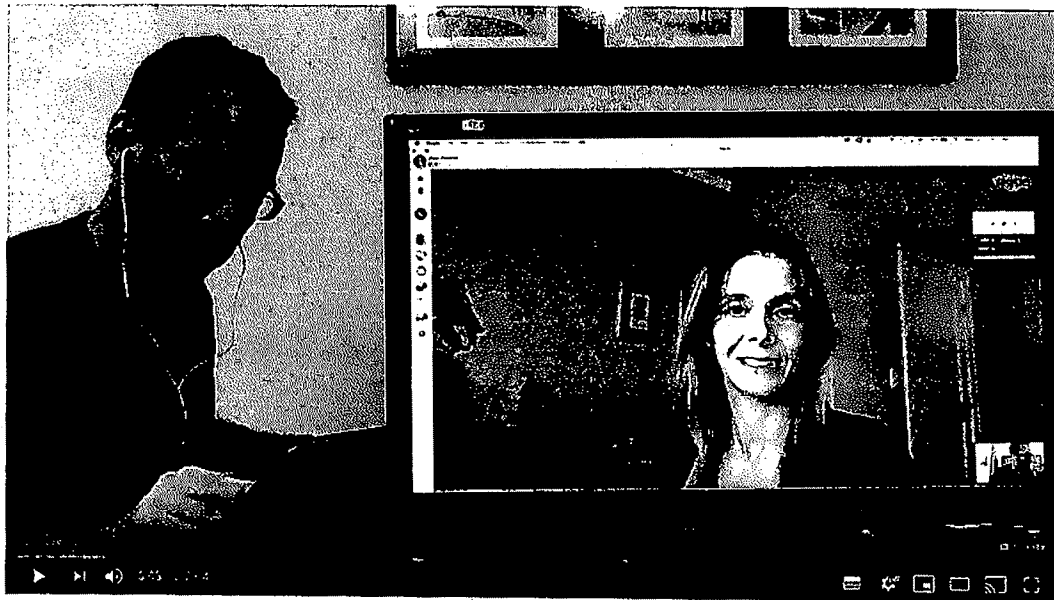
Jason Goodman • 80,169 subscribers • 72K views • Streamed 1 year ago •

Support this movement, become a sponsor of Crowdsourcethe Truth  
<http://paypal.me/crowdsourcethetruth> or join us on Patreon ...

<https://www.youtube.com/watch?v=ekr5cw2WAbU>

Premium

clear and present danger maersk memphis



**Clear and Present Danger (Calm Before the Storm?) #maerskmemphis**

72,205 views

770 196 SHARE SAVE ...



**Jason Goodman**  
Streamed live on 14 Jun 2017

SUBSCRIBED 80K

Support this movement, become a sponsor of Crowdsourcethe Truth

<http://paypal.me/crowdsourcethetruth>

or join us on Patreon - <https://www.patreon.com/user>

George receives startling intel from "Deep Uranium" indicating a strong possibility of Clear and Present Danger due to illicit radiological material on board the Maersk Memphis.

If you haven't seen this, watch the Crowdsourcethe Truth community spring into action to alert the USCG of this serious threat. Multiple main stream news stories as well as other first hand reports since this event have revealed the extent of depleted uranium proliferation we face today.

This is the video the kicked off the RDS / DF / H.A.C.K. Goodman / CNN / NY Times fueled #fakenews nonsense about a dirty bomb "hoax". Threats are real, neutralizing threats is our duty.

## Exhibit E Wikipedia Page for Dirty Bomb

[https://en.wikipedia.org/wiki/Dirty\\_bomb](https://en.wikipedia.org/wiki/Dirty_bomb)

# Dirty bomb

From Wikipedia, the free encyclopedia

[Jump to navigation](#)[Jump to search](#)

*For other uses, see Dirty bomb (disambiguation).*

*Not to be confused with Salted bomb.*

## Terrorism

- **Definitions**
- **History**
- **Incidents**

**By ideology**[\[show\]](#)

**Structure**[\[show\]](#)

- **Methods**
- **Tactics**

[\[show\]](#)

**Terrorist groups**[\[show\]](#)

**Adherents**[\[show\]](#)

**Response to terrorism**[\[show\]](#)

- **v**
- **t**
- **e**

A **dirty bomb** or **radiological dispersal device (RDD)** is a speculative radiological weapon that combines radioactive material with conventional explosives. The purpose of the weapon is to contaminate the area around the dispersal agent/conventional explosion with radioactive material, serving primarily as an area denial device against civilians. It is, however, not to be confused with a nuclear explosion, such as a fission bomb, which by releasing nuclear energy produces blast effects far in excess of what is achievable by the use of conventional explosives.

Though an RDD would be designed to disperse radioactive material over a large area, a bomb that uses conventional explosives and produces a blast wave would be far more lethal to people than the hazard posed by radioactive material that may be mixed with the explosive.<sup>[1]</sup> At levels created from probable sources, not enough radiation would be present to cause severe illness or death. A test explosion and subsequent calculations done by the United States Department of Energy found that assuming nothing is done to clean up the affected area and everyone stays in the affected area for one year, the radiation exposure would be "fairly high" but not fatal.<sup>[23]</sup> Recent analysis of the nuclear fallout from the Chernobyl disaster confirms this, showing that the effect on many people in the surrounding area, although not those in proximity, was almost negligible.<sup>[4]</sup>

Since a dirty bomb is unlikely to cause many deaths by radiation exposure, many do not consider this to be a weapon of mass destruction.<sup>[2]</sup> Its purpose would presumably be to create psychological, not physical, harm through ignorance, mass panic, and terror. For this reason dirty bombs are sometimes called "weapons of mass disruption". Additionally, containment and decontamination of thousands of victims, as well as decontamination of the affected area might require considerable time and expense, rendering areas partly unusable and causing economic damage.



## Contents

- 1 Dirty bombs and terrorism
  - 1.1 Effect of a dirty bomb explosion
  - 1.2 Accidents with radioactives
  - 1.3 Public perception of risks
  - 1.4 Constructing and obtaining material for a dirty bomb
  - 1.5 Possibility of terrorist groups using dirty bombs
- 2 Dirty bomb tests
- 3 Detection and prevention
- 4 Personal safety
- 5 Other uses of the term
- 6 In popular culture
- 7 See also
- 8 References
  - 8.1 Notes
  - 8.2 Works cited
- 9 External links

## Dirty bombs and terrorism[edit]

*Further information: Nuclear terrorism*

Since the 9/11 attacks the fear of terrorist groups using dirty bombs has increased immensely, which has been frequently reported in the media.<sup>[5]</sup> The meaning of terrorism used here, is described by the U.S. Department of Defense's definition, which is "the calculated use of unlawful violence or threat of unlawful violence to inculcate fear; intended to coerce or to intimidate governments or societies in the pursuit of goals that are generally political, religious, or ideological objectives".<sup>[6]</sup> There have only ever been two cases of caesium-containing bombs, and neither was detonated. Both involved Chechnya. The first attempt of radiological terror was carried out in November 1995 by a group of Chechen separatists, who buried a caesium-137 source wrapped in explosives at the Izmaylovsky Park in Moscow. A Chechen rebel leader alerted the media, the bomb was never activated, and the incident amounted to a mere publicity stunt.<sup>[7]</sup>

In December 1998, a second attempt was announced by the Chechen Security Service, who discovered a container filled with radioactive materials attached to an explosive mine. The bomb was hidden near a railway line in the suburban area Argun, ten miles east of the Chechen capital of Grozny. The same Chechen separatist group was suspected to be involved.<sup>[8]</sup> Despite the increased fear of a dirty bombing attack, it is hard to assess whether the actual risk of such an event has increased significantly.<sup>[9]</sup> The following discussions on implications, effects and probability of an attack, as well as indications of terror groups planning such, are based mainly on statistics, qualified guessing and a few comparable scenarios.

## Effect of a dirty bomb explosion[edit]

When dealing with the implications of a dirty bomb attack, there are two main areas to be addressed: (i) the civilian impact, not only dealing with immediate casualties and long term health issues, but also the psychological effect and then (ii) the economic impact. With no prior event of a dirty bomb detonation, it is considered difficult to predict the impact. Several analyses have predicted that RDDs will neither sicken nor kill many people.<sup>[10]</sup>

## Accidents with radioactives[edit]

The effects of uncontrolled radioactive contamination have been reported several times.

*See also: Lists of nuclear disasters and radioactive incidents*

One example is the radiological accident occurring in Goiânia, Brazil, between September 1987 and March 1988: Two metal scavengers broke into an abandoned radiotherapy clinic and removed a teletherapy source capsule containing powdered caesium-137 with an activity of 50 TBq. They brought it back to the home of one of the men to take it apart and sell as scrap metal. Later that day both men were showing acute signs of radiation illness with vomiting and one of the men had a swollen hand and diarrhea. A few days later one of the men punctured the 1 mm thick window of the capsule, allowing the caesium chloride powder to leak out and when realizing the powder glowed blue in the dark, brought it back home to his family and friends to show it off. After 2 weeks of spread by contact contamination causing an increasing number of adverse health effects, the correct diagnosis of acute radiation sickness was made at a hospital and proper precautions could be put into procedure. By this time 249 people were contaminated, 151 exhibited both external and internal contamination of which 20 people were seriously ill and 5 people died.<sup>[11]</sup>



The Goiânia incident to some extent predicts the contamination pattern if it is not immediately realized that the explosion spread radioactive material, but also how fatal even very small amounts of ingested radioactive powder can be.<sup>[12]</sup> This raises worries of terrorists using powdered alpha emitting material, that if ingested can pose a serious health risk,<sup>[13]</sup> as in the case of deceased former K.G.B. spy Alexander Litvinenko, who either ate, drank or inhaled polonium-210. "Smoky bombs" based on alpha emitters might easily be just as dangerous as beta or gamma emitting dirty bombs.<sup>[14]</sup>

*Main article: Goiânia accident*

### **Public perception of risks[edit]**

For the majority involved in an RDD incident, the radiation health risks (i.e. increased probability of developing cancer later in life due to radiation exposure) are comparatively small, comparable to the health risk from smoking five packages of cigarettes on a daily basis.<sup>[15]</sup> The fear of radiation is not always logical. Although the exposure might be minimal, many people find radiation exposure especially frightening because it is something they cannot see or feel, and it therefore becomes an unknown source of danger. Dealing with public fear may prove the greatest challenge in case of an RDD event.<sup>[16]</sup> Policy, science and media may inform the public about the real danger and thus reduce the possible psychological and economic effects.

Statements from the U.S. government after 9/11 may have contributed unnecessarily to the public fear of a dirty bomb. When United States Attorney General John Ashcroft on June 10, 2002, announced the arrest of José Padilla, allegedly plotting to detonate such a weapon, he said:

[A] radioactive "dirty bomb" (...) spreads radioactive material that is highly toxic to humans and can cause mass death and injury.

— *Attorney General John Ashcroft*<sup>[12]</sup>

This public fear of radiation also plays a big role in why the costs of an RDD impact on a major metropolitan area (such as lower Manhattan) might be equal to or even larger than that of the 9/11 attacks.<sup>[12]</sup> Assuming the radiation levels are not too high and the area does not need to be abandoned such as the town of Pripjat near the Chernobyl reactor,<sup>[17]</sup> an expensive and time consuming cleanup procedure will begin. This will mainly consist of tearing down highly contaminated buildings, digging up contaminated soil and quickly applying sticky substances to remaining surfaces so that radioactive particles adhere before radioactivity penetrates the building materials.<sup>[18]</sup> These procedures are the current state of the art for radioactive contamination cleanup, but some experts say that a complete cleanup of external surfaces in an urban area to current decontamination limits may not be technically feasible.<sup>[12]</sup> Loss of working hours will be vast during cleanup, but even after the radiation levels reduce to an acceptable level, there might be residual public fear of the site including possible unwillingness to conduct business as usual in the area. Tourist traffic is likely never to resume.<sup>[12]</sup>

There is also a psychological warfare element to radioactive substances. Visceral fear is not widely aroused by the daily emissions from coal burning, for example, even though a National Academy of Sciences study found this causes 10,000 premature deaths a year in the US population of 317,413,000. Medical errors leading to death in U.S. hospitals are estimated to be between 44,000 and 98,000. It is "only nuclear radiation that bears a huge psychological burden — for it carries a unique historical legacy".<sup>[19]</sup>

### **Constructing and obtaining material for a dirty bomb[edit]**

In order for a terrorist organization to construct and detonate a dirty bomb, it must acquire radioactive material. Possible RDD material could come from the millions of radioactive sources used worldwide in the industry, for medical purposes and in academic applications mainly for research.<sup>[20]</sup> Of these sources, only nine reactor produced isotopes stand out as being suitable for radiological terror: americium-241, californium-252, caesium-137, cobalt-60, iridium-192, plutonium-238, polonium-210, radium-226 and strontium-90,<sup>[9]</sup> and even from these it is possible that radium-226 and polonium-210 do not pose a significant threat.<sup>[21]</sup> Of these sources the U.S. Nuclear Regulatory Commission has estimated that within the U.S., approximately one source is lost, abandoned or stolen every day of the year. Within the European Union the annual estimate is 70.<sup>[22]</sup> There exist thousands of such "orphan" sources scattered throughout the world, but of those reported lost, no more than an estimated 20 percent can be classified as a potential high security concern if used in a RDD.<sup>[21]</sup> Especially Russia is believed to house thousands of orphan sources, which were lost following the collapse of the Soviet Union. A large but unknown number of these sources probably belong to the high security risk category. Noteworthy are the beta emitting strontium-90 sources used as radioisotope thermoelectric generators for beacons in lighthouses in remote areas of Russia.<sup>[23]</sup> In December 2001, three Georgian woodcutters stumbled over such a power generator and dragged it back to their camp site to use it as a heat source. Within hours they suffered from acute radiation sickness and sought hospital treatment. The International Atomic Energy Agency (IAEA) later stated that it contained approximately 40 kilocuries (1.5 PBq) of strontium,<sup>[24]</sup> equivalent to the amount of radioactivity released immediately after the Chernobyl accident (though the total radioactivity release from Chernobyl was 2500 times greater at around 100 MCi (3,700 PBq)).<sup>[25]</sup>

Although a terrorist organization might obtain radioactive material through the "black market",<sup>[26]</sup> and there has been a steady increase in illicit trafficking of radioactive sources from 1996 to 2004, these recorded trafficking incidents mainly refer to rediscovered orphan sources without any sign of criminal activity,<sup>[9]</sup> and it has been argued that there is no conclusive evidence for such a market.<sup>[27]</sup> In addition to the hurdles of obtaining usable radioactive material, there are several conflicting requirements regarding the properties of the material the terrorists need to take into consideration: First, the source should be "sufficiently" radioactive to create direct radiological damage at the explosion or at least to perform societal damage or



will be too heavy to maneuver. Third, the source should be sufficiently dispersible to effectively contaminate the area around the explosion.<sup>[28]</sup>

An example of a worst-case scenario is a terror organization possessing a source of very highly radioactive material, e.g. a strontium-90 thermal generator, with the ability to create an incident comparable to the Chernobyl accident. Although the detonation of a dirty bomb using such a source might seem terrifying, it would be hard to assemble the bomb and transport it without severe radiation damage and possible death of the perpetrators involved. Shielding the source effectively would make it almost impossible to transport and a lot less effective if detonated.

Due to the three constraints of making a dirty bomb, RDDs might still be defined as "high-tech" weapons and this is probably why they have not been used up to now.<sup>[29]</sup>

### **Possibility of terrorist groups using dirty bombs[edit]**

The present assessment of the possibility of terrorists using a dirty bomb is based on cases involving ISIS. This is because the attempts by this group to acquire a dirty bomb coming to light in all forms of media, in part due to the attention this group received for their involvement in the London bridge attack.

On 8 May 2002, José Padilla (a.k.a. Abdulla al-Muhajir) was arrested on suspicion that he was an Al-Qaeda terrorist planning to detonate a dirty bomb in the U.S. This suspicion was raised by information obtained from an arrested top Al-Qaeda official in U.S. custody, Abu Zubaydah, who under interrogation revealed that the organization was close to constructing a dirty bomb. Although Padilla had not obtained radioactive material or explosives at the time of arrest, law enforcement authorities uncovered evidence that he was on reconnaissance for usable radioactive material and possible locations for detonation.<sup>[29]</sup> It has been doubted whether José Padilla was preparing such an attack, and it has been claimed that the arrest was highly politically motivated, given the pre-9/11 security lapses by the CIA and FBI.<sup>[30]</sup>

Later, these charges against José Padilla were dropped. Although there was no hard evidence for Al-Qaeda possessing a dirty bomb, there is a broad agreement that Al-Qaeda poses a potential dirty bomb attack threat<sup>[31]</sup> because they need to overcome the alleged image that the U.S. and its allies are winning the war against terror.<sup>[9]</sup> A further concern is the argument, that "if suicide bombers are prepared to die flying airplanes into building, it is also conceivable that they are prepared to forfeit their lives building dirty bombs".<sup>[32]</sup> If this would be the case, both the cost and complexity of any protective systems needed to allow the perpetrator to survive long enough to both build the bomb and carry out the attack, would be significantly reduced.<sup>[12]</sup>

Several other captives were alleged to have played a role in this plot.<sup>[33]</sup> Guantanamo captive Binyam Mohammed has alleged he was subjected to extraordinary rendition, and that his confession of a role in the plot was coerced through torture.<sup>[34][35]</sup> He sought access through the American and United Kingdom legal systems to provide evidence he was tortured.<sup>[36][37]</sup> Guantanamo military commission prosecutors continue to maintain the plot was real, and charged Binyam for his alleged role in 2008. However they dropped this charge in October 2008, but maintain they could prove the charge and were only dropping the charge to expedite proceedings. US District Court Judge Emmet G. Sullivan insisted that the administration still had to hand over the evidence that justified the dirty bomb charge, and admonished United States Department of Justice lawyers that dropping the charge "raises serious questions in this court's mind about whether those allegations were ever true."

In 2006, Dhiren Barot from North London pleaded guilty of conspiring to murder innocent people within the United Kingdom and United States using a radioactive dirty bomb. He planned to target underground car parks within the UK and buildings in the U.S. such as the International Monetary Fund, World Bank buildings in Washington D.C., the New York Stock Exchange, Citigroup buildings and the Prudential Financial buildings in Newark, New Jersey. He also faces 12 other charges including, conspiracy to commit public nuisance, seven charges of making a record of information for terrorist purposes and four charges of possessing a record of information for terrorist purposes. Experts say if the plot to use the dirty bomb was carried out "it would have been unlikely to cause deaths, but was designed to affect about 500 people."<sup>[38]</sup>

In January 2009, a leaked FBI report described the results of a search of the Maine home of James G. Cummings, a white supremacist who had been shot and killed by his wife. Investigators found four one-gallon containers of 35 percent hydrogen peroxide, uranium, thorium, lithium metal, aluminum powder, beryllium, boron, black iron oxide and magnesium as well as literature on how to build dirty bombs and information about cesium-137, strontium-90 and cobalt-60, radioactive materials.<sup>[39]</sup> Officials confirmed the veracity of the report but stated that the public was never at risk.<sup>[40]</sup>

In April 2009, the Security Service of Ukraine announced the arrest of a legislator and two businessmen from the Ternopil Oblast. Seized in the undercover sting operation was 3.7 kilograms of what was claimed by the suspects during the sale as plutonium-239, used mostly in nuclear reactors and nuclear weapons, but was determined by experts to be probably americium, a "widely used" radioactive material which is commonly used in amounts of less than 1 milligram in smoke detectors, but can also be used in a dirty bomb. The suspects reportedly wanted US\$10 million for the material, which the Security Service determined was produced in Russia during the era of the Soviet Union and smuggled into Ukraine through a neighboring country.<sup>[41][42]</sup>

In July 2014, ISIS militants seized 88 pounds (40 kg) of uranium compounds from Mosul University. The material was unenriched and so could not be used to build a conventional fission bomb, but a dirty bomb is a theoretical possibility. However, uranium's relatively low radioactivity makes it a poor candidate for use in a dirty bomb.<sup>[43][44]</sup>

Little is known about civil preparedness to respond to a dirty bomb attack. The Boston Marathon appeared to many to be a situation with high potential for use of a dirty bomb as a terrorist weapon.<sup>[45]</sup> However, the bombing attack that occurred on April 15, 2013 did not involve use of dirty bombs. Any radiological testing or inspections that may have occurred follow

the attack were either conducted sub rosa or not at all. Also, there was no official dirty bomb "all clear" issued by the Obama administration. Massachusetts General Hospital had, apparently under their own disaster plan, issued instructions to their emergency room to be prepared for incoming radiation poisoning cases.<sup>[46]</sup>

Terrorist organizations may also capitalize on the fear of radiation to create weapons of mass disruption rather than weapons of mass destruction. A fearful public response may in itself accomplish the goals of a terrorist organization to gain publicity or destabilize society.<sup>[47]</sup> Even simply stealing radioactive materials may trigger a panic reaction from the general public. Similarly, a small-scale release of radioactive materials or a threat of such a release may be considered sufficient for a terror attack.<sup>[47]</sup> Particular concern is directed towards the medical sector and healthcare sites which are "intrinsically more vulnerable than conventional licensed nuclear sites".<sup>[47]</sup> Opportunistic attacks may range to even kidnapping patients whose treatment involve radioactive materials. Of note is the public reaction to the Goiânia accident, in which over 100,000 people admitted themselves to monitoring, while only 49 were admitted to hospitals. Other benefits to a terrorist organization of a dirty bomb include economic disruption in the area affected, abandonment of affected assets (such as buildings, subways) due to public concern, and international publicity useful for recruitment.<sup>[48]</sup>

## Dirty bomb tests[edit]

Israel carried out a four-year series of tests on nuclear explosives to measure the effects were "hostile forces" ever to use them against Israel, Israel's Haaretz daily newspaper reported June 8, 2015.<sup>[49]</sup>

## Detection and prevention[edit]

Dirty bombs may be prevented by detecting illicit radioactive materials in shipping with tools such as a Radiation Portal Monitor.<sup>[50]</sup> Similarly, unshielded radioactive materials may be detected at checkpoints by Geiger Counters, gamma-ray detectors, and even Customs and Border Patrol (CBS) pager-sized radiation detectors.<sup>[48]</sup> Hidden materials may also be detected by x-ray inspection and heat emitted may be picked up by infrared detectors. Such devices, however, may be circumvented by simply transporting materials across unguarded stretches of coastline or other barren border areas.<sup>[48]</sup>

One proposed method for detecting shielded Dirty Bombs is Nanosecond Neutron Analysis (NNA).<sup>[51]</sup> Designed originally for the detection of explosives and hazardous chemicals, NNA is also applicable to fissile materials. NNA determines what chemicals are present in an investigated device by analyzing emitted  $\gamma$ -emission neutrons and  $\alpha$ -particles created from a reaction in the neutron generator. The system records the temporal and spatial displacement of the neutrons and  $\alpha$ -particles within separate 3D regions.<sup>[51]</sup> A prototype dirty-bomb detection device created with NNA is demonstrated to be able to detect uranium from behind a 5 cm-thick lead wall.<sup>[51]</sup> Other radioactive material detectors include Radiation Assessment and Identification (RAID) and Sensor for Measurement and Analysis of Radiation Transients, both developed by Sandia National Laboratories.<sup>[52]</sup>

The International Atomic Energy Agency (IAEA) recommends certain devices be used in tandem at country borders to prevent transfer of radioactive materials, and thus the building of dirty bombs.<sup>[53]</sup> They define the four main goals of radiation detection instruments as detection, verification, assessment and localization, and identification as a means to escalate a potential radiological situation. The IAEA also defines the following types of instruments.<sup>[53]</sup>

- **Pocket-Type Instruments:** these instruments provide a low-power, mobile option to detection that allows for security officers to passively scan an area for radioactive materials. These devices should be easily worn, should have an alarm threshold of three times normal radiation levels, and should have a long battery life - over 800 hours.
- **Handheld Instruments:** these instruments may be used to detect all types of radiation (including neutron) and may be used to search specific targets flexibly. These instruments should aim for ease of use and speed, ideally weighing less than 2 kg and being able to make measurements in less than a second.
- **Fixed, installed instruments:** these instruments provide a continuous, automatic detection system that can monitor pedestrians and vehicles that pass through. To work effectively pedestrians and vehicles should be led close to the detectors, as performance is directly related to range.

Legislative and regulatory actions can also be used to prevent access to materials needed to create a dirty bomb. Examples include the 2006 U.S. Dirty Bomb Bill, the Yucca Flats proposal, and the Nunn-Lugar act.<sup>[52]</sup> Similarly, close monitoring and restrictions of radioactive materials may provide security for materials in vulnerable private-sector applications, most notably in the medical sector where such materials are used for treatments.<sup>[47]</sup> Suggestions for increased security include isolation of materials in remote locations and strict limitation of access.

One way to mitigate a major effect of a radiological weapons may also be to educate the public on the nature of radioactive materials. As one of the major concerns of a dirty bomb is the public panic proper education may prove a viable counter-measure.<sup>[48]</sup> Education on radiation is considered by some to be "the most neglected issue related to radiological terrorism".<sup>[47]</sup>

## Personal safety[edit]

See Acute radiation syndrome

The Dirty Bomb Fact Sheet from FEMA states that the main danger of a dirty bomb comes from the initial blast rather than the radioactive materials.<sup>[54]</sup> To mitigate the risk of radiation exposure, however, FEMA suggests the following guidelines:

- Covering the mouth/nose with cloth to reduce risk of breathing in radioactive materials.
- Avoiding touching materials touched by the explosion.
- Quickly relocating inside to shield from radiation.
- Remove and pack up clothes. Keep clothes until instructed by authorities how to dispose of them.
- Keep radioactive dust outside.
- Remove all dust possible by showering with soap and water.
- Avoid taking potassium iodide, as it only prevents effects from radioactive iodine and may instead cause a dangerous reaction.

### Other uses of the term[edit]

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The term has also been used historically to refer to certain types of nuclear weapons. Due to the inefficiency of early nuclear weapons, only a small amount of the nuclear material would be consumed during the explosion. Little Boy had an efficiency of only 1.4%. Fat Man, which used a different design and a different fissile material, had an efficiency of 14%. Thus, they tended to disperse large amounts of unused fissile material, and the fission products, which are on average much more dangerous, in the form of nuclear fallout. During the 1950s, there was considerable debate over whether "clean" bombs could be produced and these were often contrasted with "dirty" bombs. "Clean" bombs were often a stated goal and scientists and administrators said that high-efficiency nuclear weapon design could create explosions which generated almost all of their energy in the form of nuclear fusion, which does not create harmful fission products.

But the *Castle Bravo* accident of 1954, in which a thermonuclear weapon produced a large amount of fallout which was dispersed among human populations, suggested that this was not what was actually being used in modern thermonuclear weapons; which derive around half of their yield from a final fission stage of the fast fissioning of the uranium tamper of the secondary. While some proposed producing "clean" weapons, other theorists noted that one could make a nuclear weapon intentionally "dirty" by "salting" it with a material, which would generate large amounts of long-lasting fallout when irradiated by the weapon core. These are known as salted bombs; a specific subtype often noted is a cobalt bomb.

### In popular culture[edit]

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- In the 1964 British movie *Goldfinger*, both Auric Goldfinger and James Bond refer to the nuclear device being smuggled into Fort Knox as "dirty."
- The crime drama television series *Numb3rs* has an episode that revolves around a dirty bomb (season 1, episode 10).
- In a two-part 2011 episode of *Castle*, former US soldiers plot to detonate a dirty bomb in New York City and frame a Syrian immigrant for the crime.
- In the 2012 series finale of *Flashpoint*, an officer is poisoned by caesium from a dirty bomb and is administered Prussian blue to assist in recovery.
- In the 2013 Indian movie *Vishwaroopam*, the plot revolves around a dirty bomb developed by scraping caesium from oncological equipment to trigger a blast in New York City.
- In the 2014 movie, *Batman: Assault on Arkham*, the Joker has a dirty bomb which he plans on detonating in Gotham.
- In the January 14, 2016 Republican presidential debates, Ben Carson referenced dirty bombs twice when speaking on US foreign policy.
- In the June 1, 2015 game by Splash Damage, *Dirty Bomb*, the game is played in a dirty bomb fallout area in London.
- In the *Madam Secretary* episode "Right of the Boom", a dirty bomb is detonated at a women's education conference in Washington, D.C.
- The American political drama web television series *House of Cards* has an episode that revolves around a dirty bomb (season 5, episode 7).
- In the 2006 movie *Right At Your Door* multiple dirty bombs are detonated in Los Angeles.
- In the 2018 video game *Detroit: Become Human* one of the endings has a character setting off a dirty bomb in southern Detroit.
- In the 2019 video game *Metro Exodus* one of the Russian Major cities has been struck by a dirty bomb during the end of World War 3.

### See also[edit]

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- Lists of nuclear disasters and radioactive incidents
- Nuclear warfare
- Radiation hormesis
- Radiation poisoning
- Nuclear weapon design
- Depleted uranium
- Gammator

- 1968 Thule Air Base B-52 crash
- German nuclear energy project

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**Exhibit F – Steemit post, “Short Bus Physics With Quinn and J.Go”**

<https://steemit.com/truth/@steveouttrim/short-bus-physics-with-quinn-and-j-go>

# Short Bus Physics With Quinn and J.Go

steveouttrim (57) in truth • last year

So I was watching the latest casino update from the #clownsource team, and there were a few things I wanted to bring your attention to.

I think J.Go does the graphics himself, in his last show with Charles Ortel about Pirates of the Caribbean he said @esthetruth was a one-man team. In this one he is making Quinn look like a bobble-headed court jester, which is an interesting message in itself. #sendbitcoin.

It's not clear why Quinn always has to meet J.Go in casinos. Maybe they're still hot on the trail of secret bitcoin mining from the poker machines, chasing down the truth like George Webb chasing Uzbeki Uranium Truckers at crack houses with Task Bar.

Of course, last time Quinn and J.Go hung out in a casino, it didn't end well.

The #esthetruth team went from Dirty Bomb false alarms shutting down ports, to instructions for how to build a weapon of mass destruction in your home and target it through walls at your neighbors.

Why? Because, @defango and/or @daveacton, allegedly. Who knows what is really going on, ARG, LARP, solving puzzles, crowdsourcing truth, or setting the real #truth movement up for a big fall?

Quinn's show with Jason had a number of things worthy of correction.

---

### Short Bus Physics

The first thing was his ideas about physics. Basically, the world is like a bus, and if more people get on the bus, the velocity (careful, don't say speed!) of the bus slows down. So we need to depopulate the earth or leave it, because too many people are affecting the earth's rotation.

@SchoolPlay did a great job already:

Here's another way to look at it.

- a) The weight of the earth is 5,972,000,000,000,000,000,000 kg
- b) The number of humans on the earth is 7,595,413,980
- c) The average weight of a human is 62 kg (137 lbs)

So the weight of the humans on the earth is  $b \times c = 470,915,666,760$  kg

Do you notice anything about that result? (other than the kinda creepy 666 in there)

There are a LOT less commas in it. In fact, expressed as a percentage, the weight of humans is 0.000000000079% of the weight of the earth.

Is this enough to cause a problem for the velocity of the earth? The weight of the world's largest concrete structure, the Three Gorges Dam in China, and the water in its reservoir is already much greater than this, concentrated in one location on the planet, and elevated above sea levels. All things that elementary physics suggests will affect the earth's rotation more than humans scattered like ants (in fact, there is even scientific argument that the weight of all the ants on the earth is more than the weight of all the humans).

So this actually happened already, diverting this huge body of water into one spot did slow the earth's rotation. And guess what: we're fine. For the weight of the world's humans to affect the earth's rotation as much as this dam, not only would we need to be all in one place at one time, but there would need to be 629,032,258,064 of us - 82.8 times as many people.

... if the earth changes its balance?



All the oil that has been extracted since 1850 is 135 billion tonnes, or 135,000,000,000,000,000 kg. [Source: Science Daily]

This is 0.0000000023% of the earth's weight. It is about a fifth of the weight of all the water and concrete in the Three Gorges Dam. Moving all the oil that has ever been extracted into one place would not cause any problems on the earth.

---

### **SIRI is Not An AI**

According to Quinn, SIRI is not AI. SIRI came from SRI - the Stanford Research Institute. It is the commercial product result of decades of research into Artificial Intelligence, including the largest Artificial Intelligence Project in history. Believe Quinn and his theories of neutrino-based quantum computing networks that you communicate with on cordless phones at the 5 Mhz spectrum because they are chatbots, or believe the Stanford Research Institute and Stanford Artificial Intelligence Laboratory that built the thing and ran the project with DARPA and the military for the many decades of its development.

Quinn's idea of #SIRISYS appears to be another thing he has come up with spontaneously, that is not backed by any detail or research. SIRI's parent company is called SIRI, Inc.

---

### **Tyler is a Secret Society Term**

Quinn admitted that #tyler, the ARG he is playing as part of Project MAYHEM, was a term from the Freemasons.

This part is true, as I exposed in some detail in Shadow History of Burners Part 7.

A bunch of occult sorcery shit. Quinn admits to many of his connections into this world, if his missing eyebrow/Sith Lord glamor wasn't clue enough.

It's amazing the way these clowns can fully reveal the method. Quinn frequently explains to the audience how he is playing them, J.Go is so confused it usually goes over his head, but even he was struggling in this episode.

Believe these people at your peril.

**Exhibit G – Steemit Votes**

<https://steemit.com/truth/@steveouttrim/short-bus-physics-with-quinn-and-j-go>

🕒 last year by **steveouttrim (57)** ▼

🕒 01:49 ▼

📄

📄 16

📄 16

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- + jasonamull
- + beverlytran
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- + fadedhistory
- + steveouttrim
- + hoaxwars
- + kirisena
- + defango

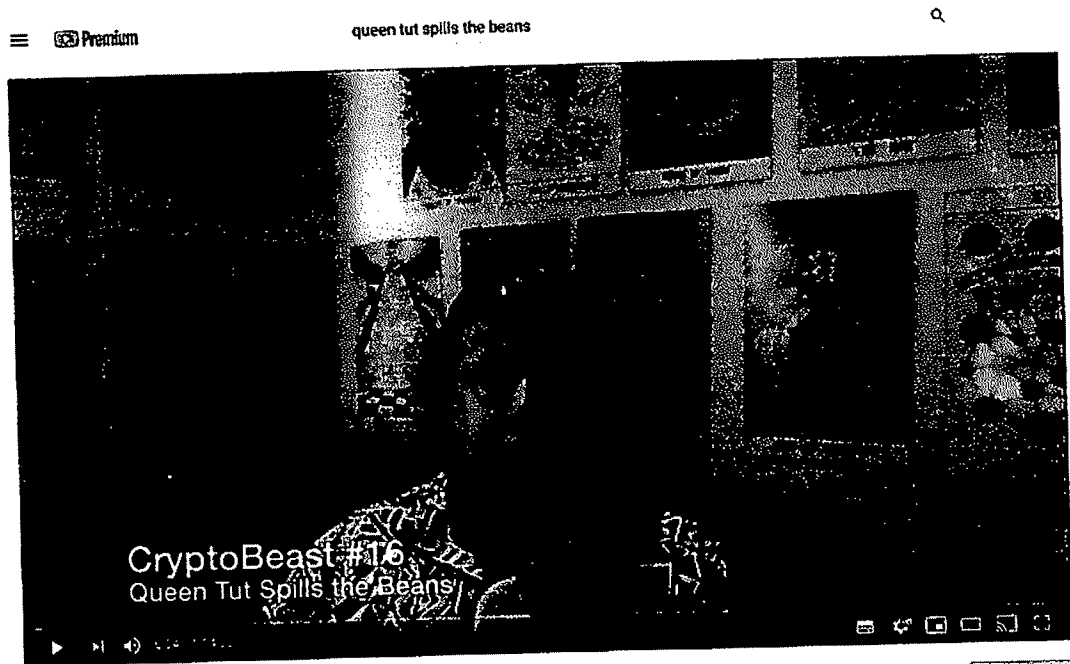
Order: Friends ▼



**frankbacon (64)** ▼ · last year

### Exhibit H – Queen Tut Spills The Beans

<https://www.youtube.com/watch?v=N1G01nJUVUM>



## CryptoBeast #16 - Queen Tut Spills The Beans

3,141 views



**Crypto Beast**  
Published on 29 Nov 2018

Queen Tut was an insider at Crowdsourcing the Truth. She reveals the tangled web of people connected to a proven FBI informant, manipulating narratives on YouTube as a sophisticated form of psychological operations.

Follow Queen Tut on Twitter: <https://twitter.com/ITNJFraud> ]

Trello Board (Robert David Steele, Roger Stone, Jerome Corsi, Jason Goodman):  
<https://trello.com/b/wT7HKV4G/copy>

Trello Board (Robert David Steele, Maccoby, #Pizzagate): <https://trello.com/b/kFq5XoLa/kod3>

Further discussion on my blog:  
<https://turners.me/2018/12/03/insane-...>

**Steve Outtrim:**  
**Twitter:** <https://twitter.com/steveouttrim>  
**Steemit:** <https://steemit.com/@steveouttrim>  
**Youtube:** <https://Youtube.com/c/steveouttrimcry...>  
**Facebook:** <https://facebook.com/steveouttrim>  
**Blog:** <https://burners.me>

**Exhibit I Aerocine article with Goodman as CEO**

<https://www.atacarnet.com/about-us/news/aerocine-introduces-high-quality-aerial-cinematography-world-ata-carnets>

## Aerocine(now Aerobo) Introduces High-Quality Aerial Cinematography to the World with ATA Carnets



May 14, 2014

**Barrington, IL** - Wearing vibrant orange shoes and trendy glasses, Brian Stroom looks like he could launch himself and hover over the crowd to get an unforgettable shot. Fantasy aside, young filmmaker Stroom, Director of Business Development, and his partners, Jason Goodman, CEO, & Jeff Brink, Founder/Director of Flight Operations at AeroCine (now Aerobo), have launched the next best thing: a micro aerial cinematography company that moves professional cinema cameras, including 3-D, in a way no one ever had ever done before, without sacrificing quality.

The founders have traveled the world to source the best parts for their aerial equipment and are now operating two drones. The drones, traveling under carnet abroad, are available for rent worldwide along with a 3-person team: pilot, camera operator and aircraft technician.



We connected with Stroom at the sUSB Expo (Small Unmanned Systems Business Expo aka the Silicon Valley Drone Show) in San Francisco last week and talked with him about the new venture introduced to the British Film Institute in March of 2014. AeroCine is using heavy lift micro copters and RED EPIC cameras to get extended range and high quality. They are the first in the world to fly stereoscopic RED EPIC cameras using the most powerful micro hexacopter available.

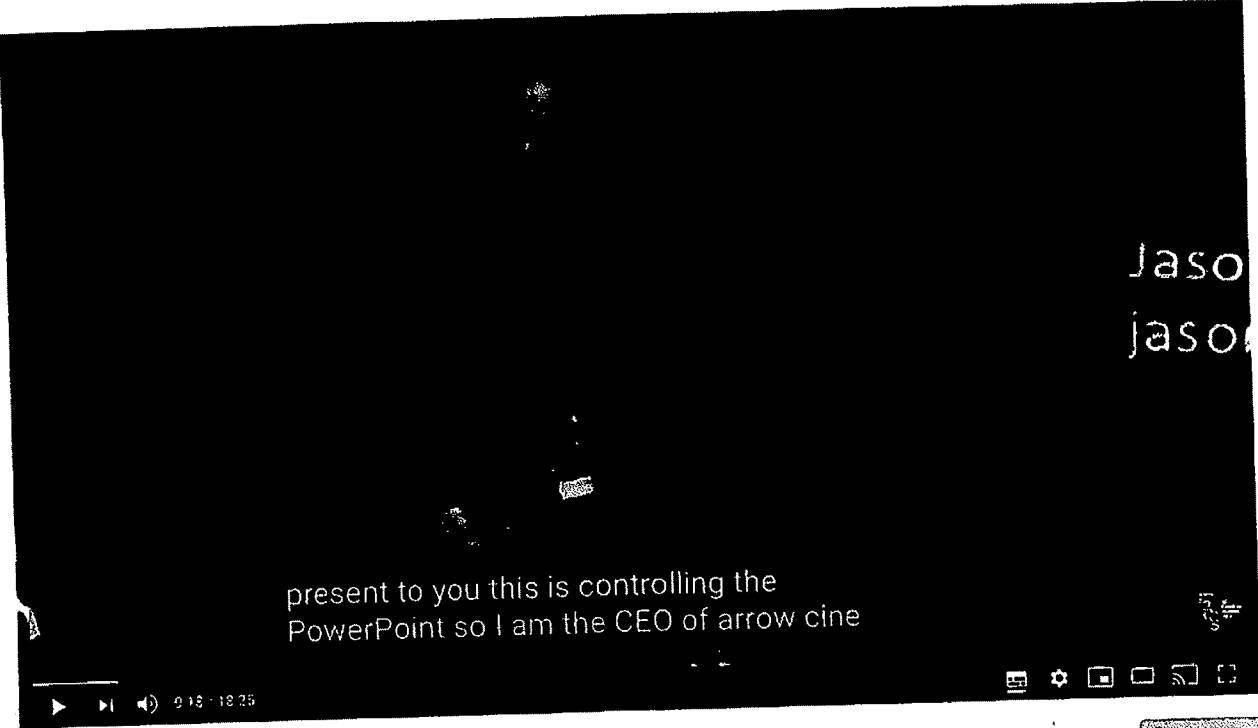
According to Stroom, the key to success is the remote pilot. With tens of thousands of dollars at risk in the flying equipment, an experienced pilot controlling the drone is the difference between a beautiful shot, safely captured and a large insurance claim.

AeroCine, by definition, is a global venture due to the lack of FAA regulations on commercial use of drones in the U.S. They have taken their aerial cameras to France, Slovenia, U.A.E., Sweden and Ukraine so far for projects and using 2 ATA Carnets they have been able to clear customs without paying import duties and taxes. Original footage shot at Chernobyl promises to deliver a perspective on the area and nuclear accident that has yet to be seen. The AeroCine team is poised to produce a documentary film from this revolutionary footage.

18 minute YouTube video from the AeroCine CEO, Jason Goodman.

**Exhibit J – Goodman Presentation as CEO of Aerocine**  
[https://www.youtube.com/watch?v=Uvi\\_bf29Myw](https://www.youtube.com/watch?v=Uvi_bf29Myw)

← ↻ 🔍 [https://www.youtube.com/watch?v=Uvi\\_bf29Myw](https://www.youtube.com/watch?v=Uvi_bf29Myw) Premium Search



AeroCine @ 3DCS 2014  
1,117 views

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 **3DCreativeSummit**  
Published on 14 Apr 2014

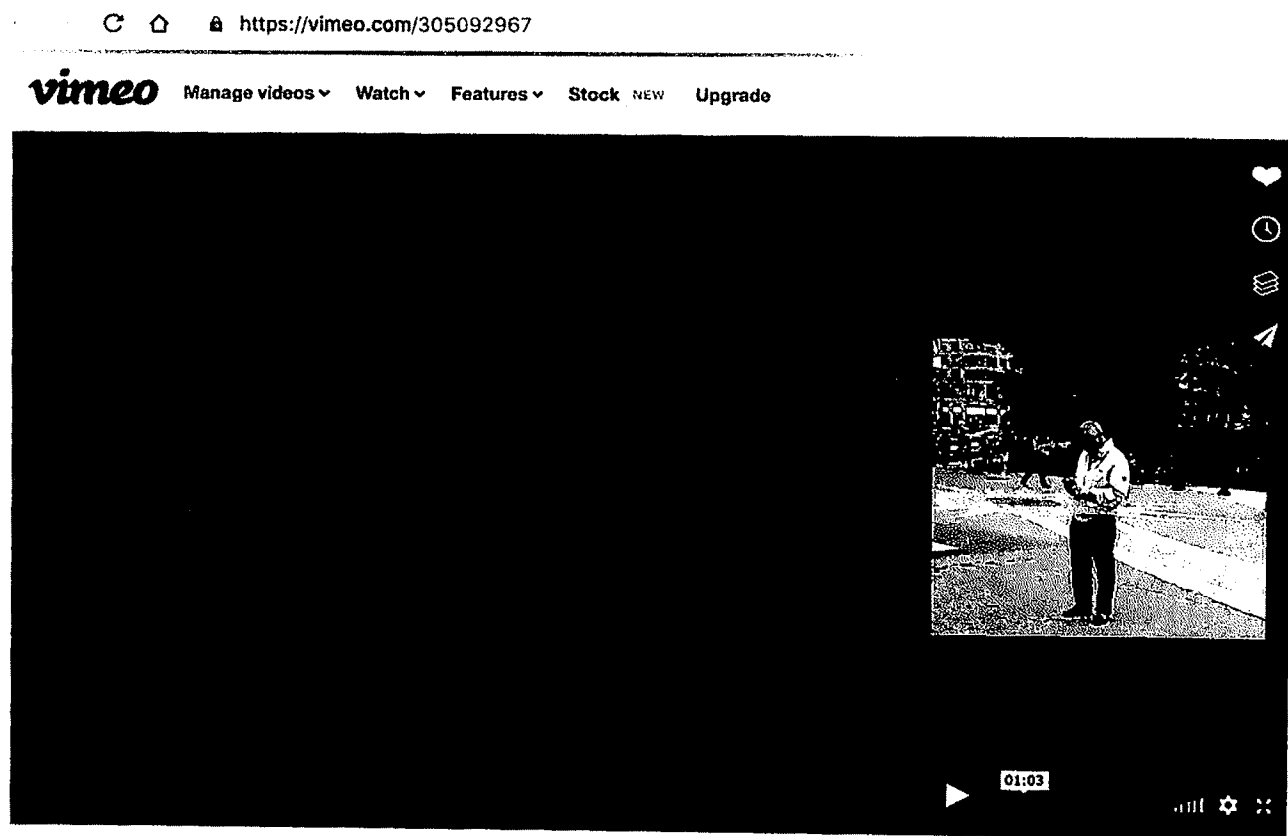
SUBSCRIBED 149 🔔

Jason Goodman of 21st Century 3D will introduce AeroCine a new micro aerial cinematography company that is the first in the world to fly stereoscopic RED EPIC cameras.

Category Film & Animation

**Exhibit K – Jason Goodman speaks fluent Russian**

<https://vimeo.com/305092967>



## Goodman Speaking Fluent Russian Confronts Fellow 'Operative'

3 months ago [More](#)



CIA Love



▶ 101 ♥ 0 🗨 0 💬 0

Jason Goodman's 'cover' is blown with his ability to recognize foreign operatives. He is the trademark owner of the drone company Aerocine. This drone company was present in the Ukraine filming Chernobyl just a few days prior to the Maidan massacre.

**Jason Goodman: From Russia with Love**

[medium.com/@thehudsonreport/jason-goodman-from-russia-with-love-2c26da55f436](https://medium.com/@thehudsonreport/jason-goodman-from-russia-with-love-2c26da55f436)

**Insane in the Ukraine: J.Go Like You've Never Seen Him Before [UPDATES]**

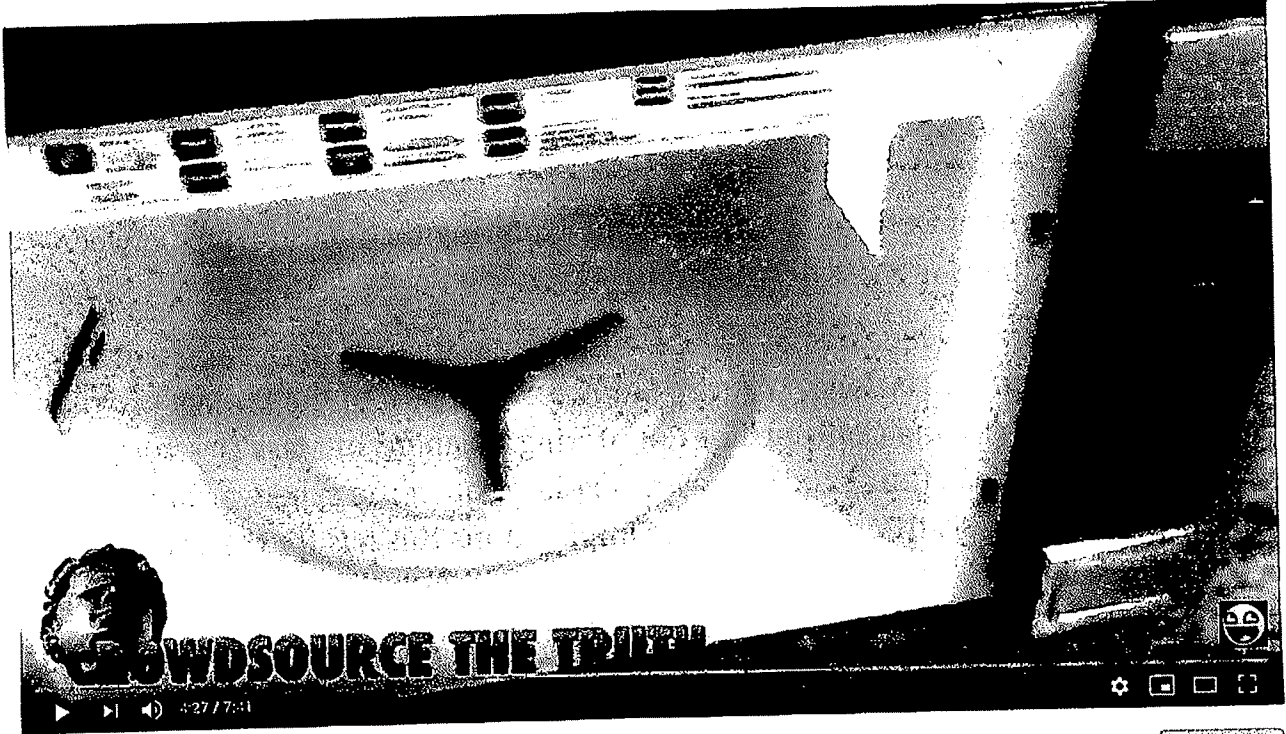
[burners.me/2018/12/03/insane-in-the-ukraine-j-go-like-youve-never-seen-him-before/](https://burners.me/2018/12/03/insane-in-the-ukraine-j-go-like-youve-never-seen-him-before/)

**Exhibit L – Jason Goodman instructions on modifying a household microwave to make improvised directed energy weapons**

<https://www.youtube.com/watch?v=TEJXti3MEcY>

← ↻ 🔍 https://www.youtube.com/watch?v=TEJXti3MEcY&t=2s ☆ 59

☰ Premium jason goodman microwave weapon 🔍



**CROWDSOURCE THE TRUTH**

How to Make a Homemade Microwave Weapon Jason Goodman

353 views

▶ 🔍 6 🗨️ 2 ➦ SHARE ➦ SAVE ...

Download



**Exhibit M – Microwave Weapons of Mass Destruction**

<https://www.fifthdomain.com/dod/2018/12/20/are-cyber-weapons-similar-to-wmds-dod-wants-to-know/>

# **Are cyber weapons similar to WMDs? DoD wants to know**

**By: Mark Pomerleau** December 20, 2018

*The Department of Defense is seeking research papers assessing the relationship between offensive cyber and weapons of mass destruction. (Courtesy of Raytheon)*

The Department of Defense is interested in exploring the relationship between cyber and weapons of mass destruction.

In a call for papers requested by the Defense Threat Reduction Agency, the Air Force's Institute for National Security Studies, in support of the Project on Advanced Systems and Concepts for Countering Weapons of Mass Destruction, wants an analysis defining the scope and exploration of the cyberwarfare-weapons of mass destruction nexus and implications this has for the counter-WMD mission.

The call for research papers raises offensive cyber weapons to a level on par with other WMDs.

The notice was first reported by Quartz.

The traditional definition of WMDs — which has included nuclear, biological, chemical, radiological and, in some applications, enhanced high-explosive weapons — does not include recent advancements in nonkinetic weapons of mass effect and destruction, the call for papers states.

Rather, the notice contends, the expanded spectrum includes dazzling and blinding weapons, ultrasonics, directed energy weapons and offensive cyber warfare.

Cyber capabilities could be considered on par with WMDs because they can corrupt or destroy critical infrastructure, such as power grids or transportation; compromise large data sets, such as health or banking; corrupt confidence in data sets, such as GPS signals; and be leveraged to orchestrate widespread disinformation campaigns utilizing social media platforms, the notice states.

Adversaries have used some or all of the elements of offensive cyber in the past decade, according to the notice.

“These operations are becoming increasingly sophisticated in nature, and steadily more integrated into adversary military doctrine, strategies, plans and operations that already incorporate and integrate conventional and unconventional weapons, to include WMD,” it states. “These developments necessitate an assessment of the potential nexus between offensive cyber operations and WMD and the implications of this interrelationship for the Countering WMD (CWMD) mission, which is one of DTRA’s missions.”

#### Audit finds cyber vulnerabilities in US missile defense system

A Defense Department Inspector General report raises more questions about the military's shoddy cybersecurity.

By: Geoff Ziezulewicz

Cyber capabilities and nuclear weapons have a complicated history among serious cyber experts and strategists as cyber has emerged as a ubiquitous element within society and government, as well as an increasing threat.

Some strategists have maintained that using the nuclear deterrence paradigm is an appropriate way to look at cyber. Others, however, strongly disagree.

According to a current U.S. official, starting from nuclear models for assessing risk and deterrence in the cyber domain has led the community in the wrong direction.

Speaking at a conference earlier this year under a non-attribution policy, the official noted that the difference between the nuclear discussion and cyber is how targets are held at risk.

In the nuclear arena, adversaries have a common understanding of the nuclear stockpiles of others and their risks. Adversaries' knowledge of how they're being held at risk has a limited application in their ability to isolate themselves from harm, the official said.

The cyber domain, however, is much murkier. What's required to hold an adversarial system at risk in cyber depends on access gained to their system by exploiting vulnerabilities, then persisting in that environment undetected to deliver an effect, the official said. Thus, it is difficult to articulate to an adversary how they are held at risk in this environment without tipping them off to the vulnerabilities being exploited, which, of course, can be patched.

**The proposal asks for research examining, among other things, how adversaries might use offensive cyber in the following ways:**

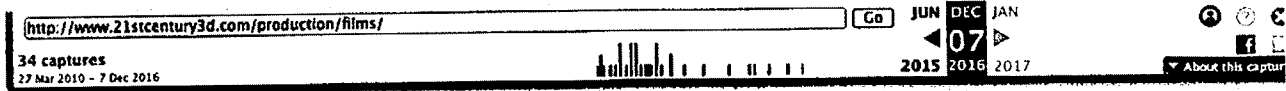
- **To improve effectiveness and lethality of their WMD arsenals;**
- **To degrade U.S. and allied defenses against WMDs;**
- **To degrade U.S. deterrence strategies or posture to improve their own strategies or posture; and**
- **As a substitute for “traditional” WMDs.**

See also: <https://fas.org/irp/threat/WEAPMASS.PDF>

## Exhibit N – Defendant Goodman's Association With Bryan Singer

Web page saved by the Internet Archive's Wayback Machine

<https://web.archive.org/web/20161207102124/http://www.21stcentury3d.com/production/films/>



3D

21st Century 3D is recognized worldwide as an innovator in stereoscopic 3D feature film production techniques and technology.



X-Men: Days of Future Past (3D), (2014)



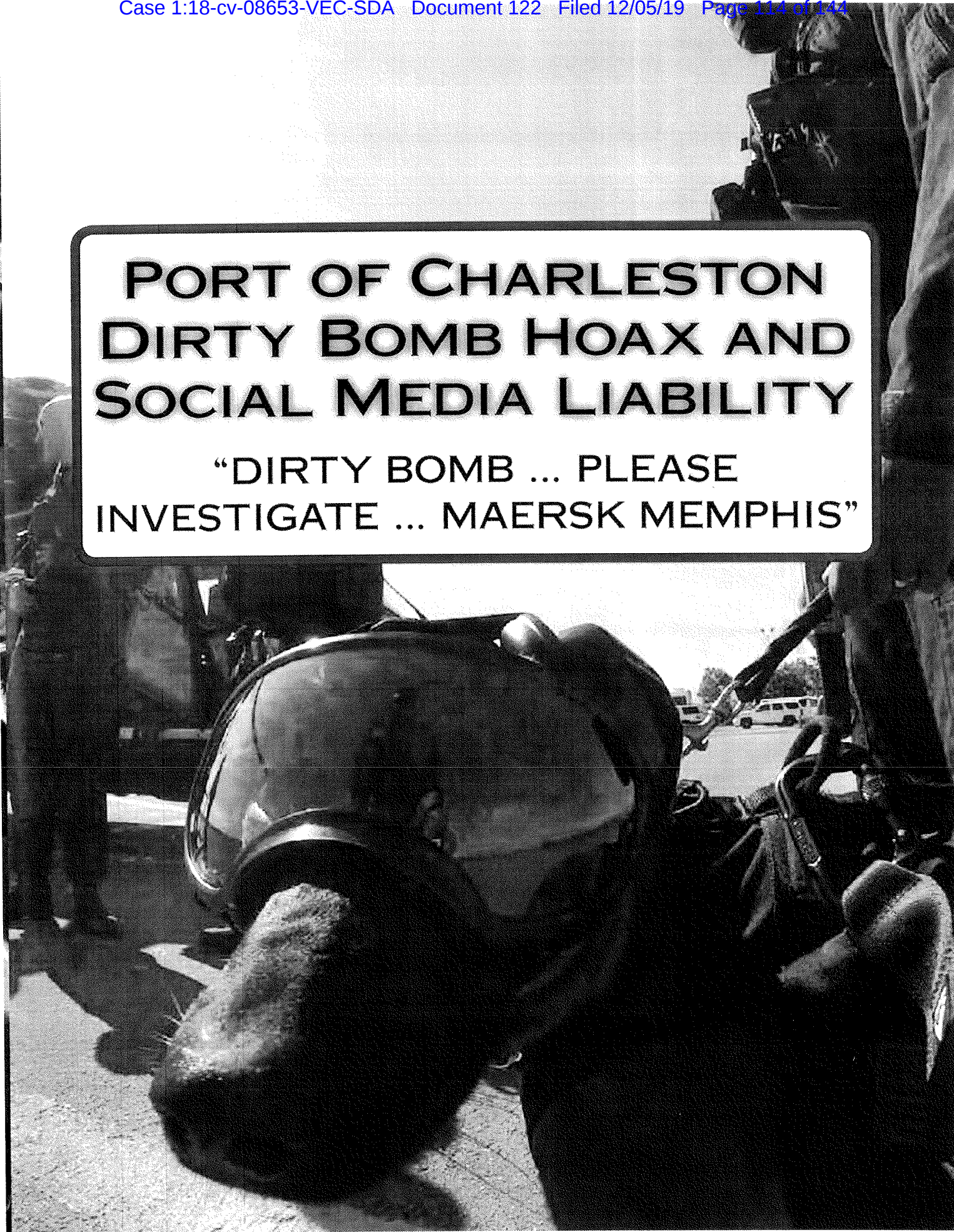
Bryan Singer remains one of the few auteur directors who insists on the quality of native stereoscopic photography rather than 2D to 3D conversion in post production. Toward this end, New Deal Studios brought on 21st Century 3D to photograph visual effects elements for the blockbuster *X-Men: Days of Future Past*. Amazing volumetric explosions, bullet hits and fire effects were just a few of the numerous elements shot with the BX5 3D rig. CEO Jason Goodman served as visual effects unit stereographer. Check *X-Men: Days of Future Past* at [IMDB](http://IMDB.com)

**(EXHIBIT F)**



# **PORT OF CHARLESTON DIRTY BOMB HOAX AND SOCIAL MEDIA LIABILITY**

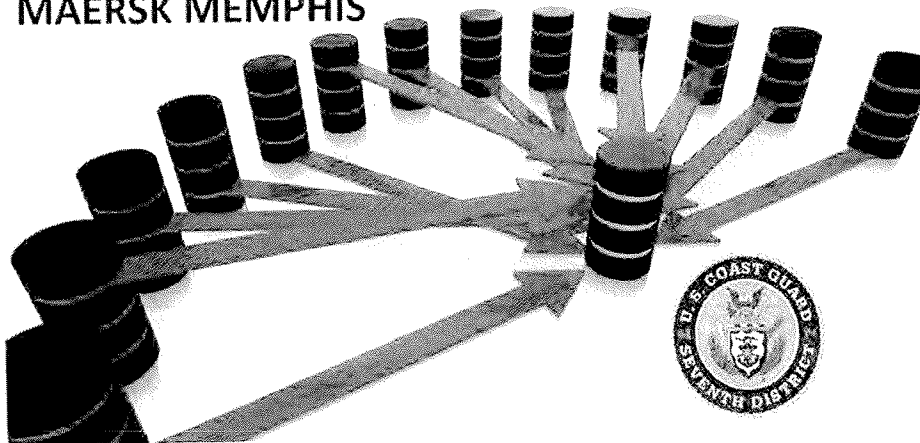
**“DIRTY BOMB ... PLEASE  
INVESTIGATE ... MAERSK MEMPHIS”**



## Port of Charleston Dirty Bomb Hoax

Immediate Need for Deterrence  
Against Weaponized Deception

**DIRTY BOMB ... PLEASE INVESTIGATE ...  
MAERSK MEMPHIS**



**WARNING:** This document provides a threat assessment of a cyber-attack vector. Individuals listed in this report should not be considered guilty of any crime or offense. The focus of this document is to present evidence of the telecommunications aspects of the "dirty bomb" alert and warning received by the U.S. Coast Guard on June 14<sup>th</sup>, 2017 in the context of federal law. Any individual discussed should be presumed innocent of any crimes until adjudicated otherwise in an appropriate court of law.





## *Executive Summary*

This evidentiary report places certain actions of a YouTube celebrity, who initiated a radiological event response during a hoax reality news show, within the context of federal law.

As demonstrated by the Port of Charleston "dirty bomb hoax" on June 14<sup>th</sup>, 2017, profit-motivated YouTube entertainers masquerading as legitimate news channels are now an emerging threat to the critical infrastructure operators of the United States.

This dangerous trend indicates that socially engineered public panics can be used to mask more serious simultaneous cyber-attacks (known as blended attacks).

Blended critical infrastructure attacks can be composed of (1) hoax or false **content** designed to alarm and distress, and (2) are distributed devices designed to **flood and overwhelm** the target. The goal of a blended act is to force an ill-advised **call-to-action** (CTA) upon the victim.

This type of weaponized deception is the product of supposed "crowd sourcing". Crowd sourcing themes can drive Live Action Role Plays (**LARPs**) that offer an Augmented Reality Game (**ARG**) experience couched in the terms of "investigative journalism".

The journalism reality show **CrowdSourceTheTruth** (CSTT) operated by Jason Goodman, convinced two (2) audience members to call the duty officer at the U.S. Coast Guard Charleston Sector with verbal information about a "dirty bomb" which led to the closure of a marine terminal in June 2017.

**Three minutes** after the initial verbal reports were telephoned to the U.S. Coast Guard Charleston Sector, CSTT's Goodman asked his audience of over **2,000** to tweet the following message to 7<sup>th</sup> District U.S.C.G. Unified Command (resulting in a "**Twitter Storm**" of **8,000** impressions).

**"DIRTY BOMB ... PLEASE INVESTIGATE ... MAERSK MEMPHIS"**

The second warning ("Twitter Storm") was a distributed denial of service (**DDoS**) attack that transmitted false and deceptive information to an official U.S. Government law enforcement agency.

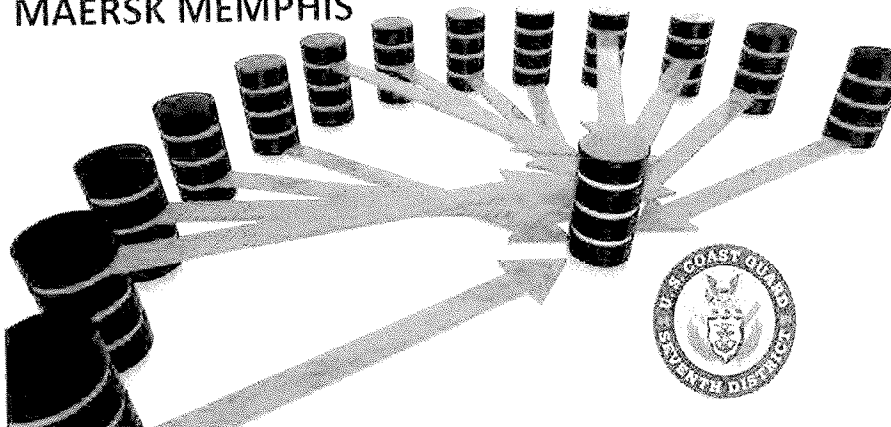
These activities appear to violate the following federal laws.

**18 U.S.C. 1038**      **CONTENT:** Goodman caused to be transmitted the following message to the 7<sup>th</sup> District Coast Guard Headquarters: "**DIRTY BOMB ... PLEASE INVESTIGATE ... MAERSK MEMPHIS**". This content was fake and a hoax.

**18 U.S.C. 1030**      **DELIVERY:** Goodman caused the above message to be transmitted with at least 8,000 Twitter impressions in a Distributed Denial of Service (**DDoS**) attack on the 7<sup>th</sup> District U.S. Coast Guard Headquarters (Unified Command).

As depicted below, the **content** of the message ("DIRTY BOMB etc") was based on false and deceptive information. The vehicle used to transmit the message to the U.S. Coast Guard 7<sup>th</sup> District Unified Command was a **DDoS-style** attack via Twitter.

**DIRTY BOMB ... PLEASE INVESTIGATE ...  
MAERSK MEMPHIS**



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*Weak Legal Deterrence Provides Immunity to Hoax Channels* .....10

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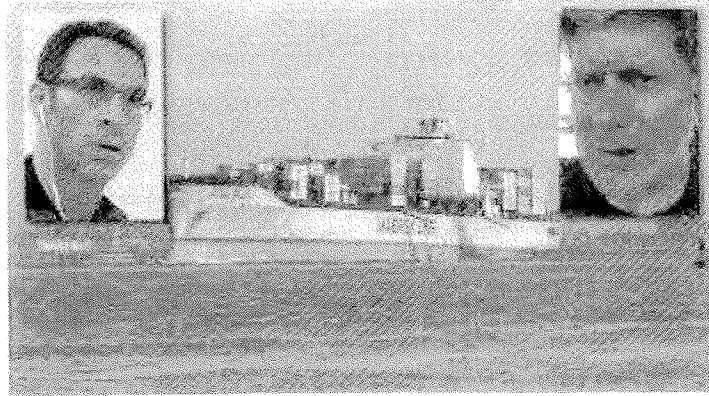
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**PART I:**  
**HOAX THREAT ACTORS**  
**ATTACK U.S.C.G.**  
**7<sup>th</sup> DISTRICT**

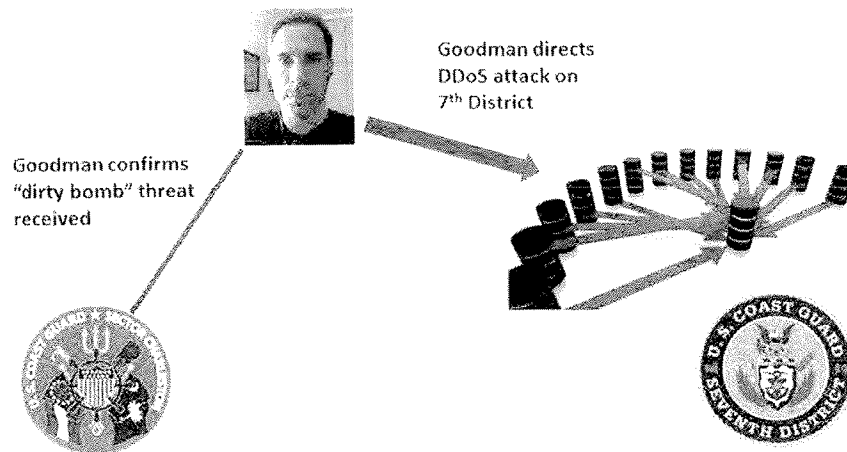


L/R: Jason David Goodman, the MAERSK MEMPHIS, George Webb Sweigert

### Three minutes between incident A and incident B

2:01:28

2:04:28



Taxonomy of distribution of dirty bomb alert and warning.

### *Background*

No individual(s) have ever been held accountable for the social media generated public hysteria that led to the emergency closure of a marine terminal at the Port of Charleston, S.C. on June 14<sup>th</sup>, 2017.

The maritime terminal closure was based on a "dirty bomb" tip provided by individuals that supposedly had knowledge of the shipment of a weapon of mass destruction (WMD) on the **MAERSK MEMPHIS** container ship (arriving in the Port of Charleston).

Two separate incidents of "dirty bomb" warnings occurred in sequence.

#### **Incident A**

Two (2) "dirty bomb" phone calls were received by the U.S. Coast Guard (U.S.C.G.) duty officer at the Charleston Sector after CSTT "intelligence coordinator" Goodman provided the emergency number live on the air (**843-740-7050**)<sup>1</sup>.

At least one of these callers was discovered to be a very close affiliate of the CSTT reality show (allegedly **Joe Napoli**).

A third call was made to the duty officer by Goodman himself to confirm that the "dirty bomb" messages were received.

Goodman (during a third call) verified (live on-air) with the duty officer at the Charleston Sector that U.S. Coast Guard Charleston Sector<sup>2</sup> that he had received the "dirty bomb" warnings.

#### **THREE MINUTES TRANSPIRE**

##### **Incident B**

Three minutes after Goodman's call to the Charleston Sector Goodman orchestrated a **DDoS** attack by suggesting everyone in his 2,117 member audience send a Twitter message to the higher command of the Charleston Sector – 7<sup>th</sup> District Unified Command. The transmission of these tweets resulted in 8,000 Twitter impressions, which flooded the 7<sup>th</sup> District with the following message.

##### **"DIRTY BOMB – PLEASE INVESTIGATE – MAERSK MEMPHIS"**

There appears to be no legitimate reason to justify the redundant DDoS "Twitter Storm". Understandably, these messages created a panic that bordered on mass hysteria accompanied by a full-scale radiological incident response followed requiring the deployment of police, fire, EMS, public works, specialty teams, etc.

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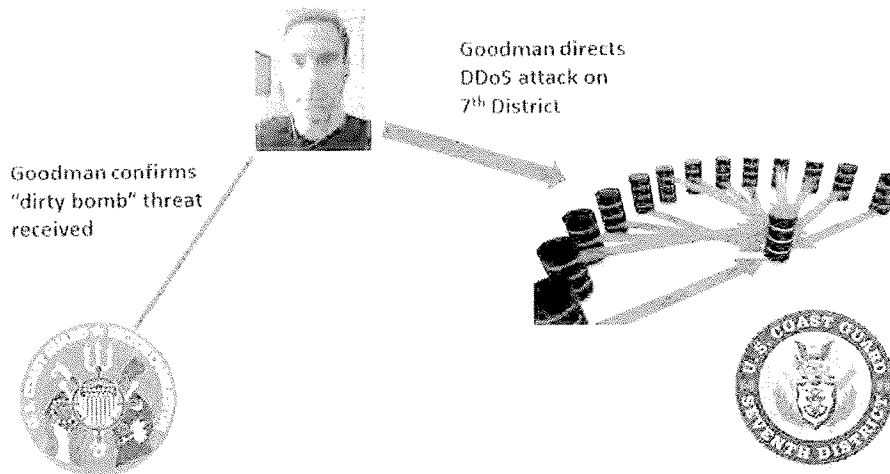
<sup>1</sup> <https://www.nytimes.com/2017/06/15/us/port-dirty-bomb-south-carolina.html>

<sup>2</sup> <https://www.atlanticarea.uscg.mil/Our-Organization/District-7/Units/Sector-Charleston/>

### Three minutes between incident A and incident B

2:01:28

2:04:28



#### *Weaponized Deception*

For Internet celebrities willing to create hoaxes based upon deceptive information (labeled as "news") their drama can be wrapped in an "investigative journalist" wrapper. This enables such channels to be in the center of the news, rather than merely just report the news.

CSTT hoaxes usually involve the activation of public safety resources to increase the allure of the perceived threat for the audience. This creates a strong emotional bond between the audience, actors and the storyline.

After audience members develop emotional commitment and engagement, a CSTT call-to-action (**CTAs**) is coerced from them. These CTAs may include e-mail bombing a target's mail address, calling the places of employment of targets and reporting criminal investigations, inciting acts of retribution against targets perceived as "enemies of the truth", etc.

Theatrical presentations of "nerve centers" (like CSTT) can bring an audience to an enhanced climax based on the inducement of fear. This can be likened to the Orson Wells broadcast of "War of the Worlds" in 1938. Such reality shows, also known as Live Action Role Plays (**LARP**), include the injection of periodic "intelligence reports" from "inside sources" to create an Augmented Reality Game (**ARG**).



These same threat actors (CSTT + CSTT affiliates) have recently increased their threat capability by operationalizing technical "attack bots" designed to automatically broadcast false information when a certain set of circumstances triggers their logic. These bots can be deployed to create "Twitter Storms" similar to Charleston.

CSTT threat actors have openly stated their desire to attack critical infrastructure to "crash the machine" and "reset the system" as part of an Internet doomsday cult philosophy<sup>3</sup>. Operationalized attack auto-bots factor heavily into this philosophy. This is not a fanciful and harmless threat.

The lack of criminal prosecution of these threat actors has created a fertile environment for continued testing and prototyping of these hoax enhancing auto-bots.

### *Weak Legal Deterrence Provides Immunity to Hoax Channels*

Laws and policies only deter if three conditions are present:

- Fear of penalty
- Probability of being caught
- Probability of penalty being administered

No deterrence has been undertaken to mitigate these CSTT hoax threat actors from creating more hoaxes impacting public safety. Since Charleston copy-cat hoax events have been staged in New Mexico by the same profit-driven threat actors (claiming an assassination attempt made on a CSTT "reporter").

These repeated public safety hoaxes appear to be an act of perfecting their hoax attack methods. There is a definite and well documented life cycle to the hoaxes created by "CSTT" to generate views and profits.

This type of threat to critical infrastructure has yet to be addressed firmly with legal action. Thus, a deterrence capability is lacking. Without effective deterrence, others (motivated by profit) will stage similar hoaxes.

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<sup>3</sup> See #TeamTyler and Project Mayhem operated by Quinn Michaels



**PART II:**  
**WILLFUL BLINDNESS OF CSTT**

### *Overcoming the Legal Obstacles to Prosecution*

CSTT hoax threat actors are fond of relying on their willful blindness and conscious disregard to apparent common sense, facts and contradictory information as an immunity defense.

The consistent reliance on ignorance to certain facts is an example of willful recklessness to avoid the truth. CSTT affiliates deliberately feign ignorance and practice avoidance of the actual circumstances surrounding these hoax events.

#### **Willful blindness in a criminal context**

**Example:** When a drug transport smuggler ("mule") crosses the U.S.-Mexican border they can claim s/he was not aware of the 162 pounds of marijuana in the car's secret compartment. This willful ignorance defense does not work.

In the same manner, when profit-motivated hoax threat actors forwards unvented warnings ("dirty bomb") to law enforcement<sup>4</sup> (understanding the consequences of such information) and then claims ignorance of the consequences ("I trusted the source") it represents a fact pattern as described in United States v. Jewell, 532 F.2d 697 (9th Cir. 1976):

*"One with a deliberate antisocial purpose in mind . . . may deliberately 'shut his eyes' to avoid knowing what would otherwise be obvious to view. In such cases, so far as criminal law is concerned, the person acts at his peril in this regard, and is treated as having 'knowledge' of the facts as they are ultimately discovered to be."*<sup>5</sup>

Goodman's own words demonstrate the concept. In the following show excerpt, Mr. Goodman speaks about the trust he has placed in someone called "Deep Uranium" (later discovered to be a former FBI informant) as source the "dirty bomb" warnings.

Recall **Incident A** when Mr. Goodman verified via phone call that the duty officer at the U.S.C.G. Sector Charleston had received a "dirty bomb" threat. Then the following remarks are made by Goodman on video, immediately following confirmation of the "dirty bomb" warning.

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<sup>4</sup> <https://law.justia.com/cases/federal/appellate-courts/F2/532/697/99156/>

<sup>5</sup> R. Perkins, Criminal Law 776 (2d ed. 1969)

*"...We've received information from a person known to me through George (Webb) as someone who is in the law-enforcement community or the whatever intelligence community. I don't know this person but I know that George frequently tells me he's spoken to this person . . . George tells me he's spoken to this person and such and is going to happen and then . . . more than once the person was correct."* 2:30:20 of video<sup>6</sup>. Remarks of Jason Goodman on 6/14/2017 YouTube reality show "CSTT".

Recall **Incident B** when Mr. Goodman requested **2,117** audience members tweet "DIRTY BOMB – PLEASE INVESTIGATE – MAERSK MEMPHIS" to the 7<sup>th</sup> District Unified Command (resulting in 8,000 Twitter impressions).

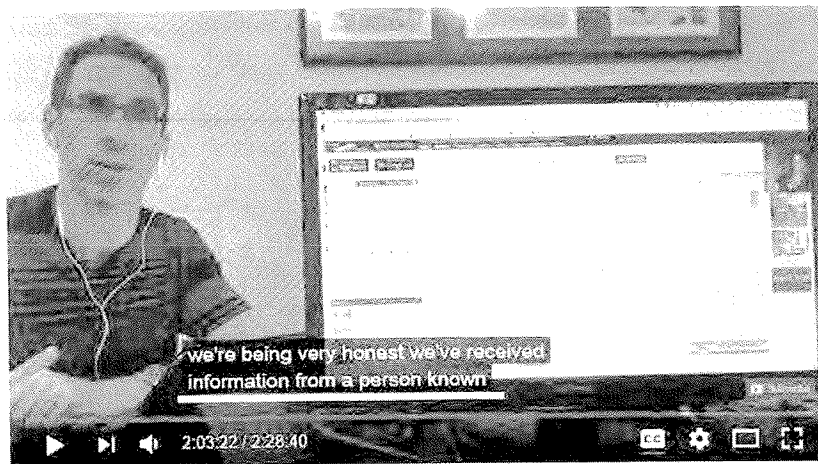
However, an hour prior to these events Goodman telephone intelligence analyst and author Dr. Jermon Corsi<sup>7</sup> to seek his advice and consultation.

**01:09:42** Jason Goodman contacts Corsi to inquire about the threat

**01:17:15** Corsi responds he doesn't know anything about the threat

**01:20:51** Corsi re-iterates he cannot corroborate anything about the threat

**01:41:06** Corsi repeats again he has ZERO confirmation of the threat



Clear and Present Danger (Calm Before the Storm?) #maerskmemphis

Video of CSTT, Jason Goodman owner/operator

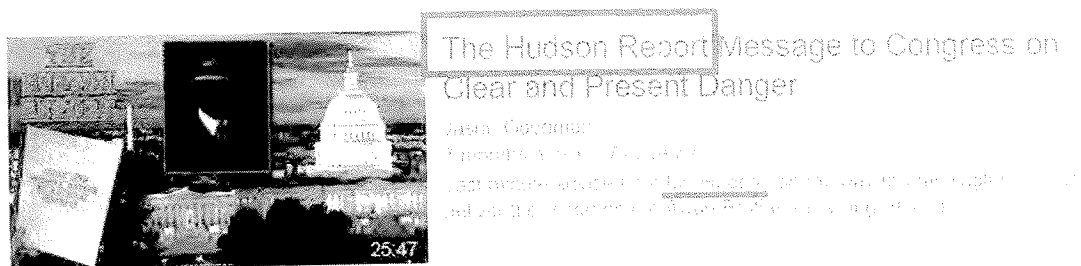
<sup>6</sup> <https://www.youtube.com/watch?v=ekr5cw2WAbU&t=7799s>

<sup>7</sup> <http://www.simonandschuster.com/authors/Jerome-R-Corsi/48217651>

This information from an intelligence industry analyst and “insider” was subsequently disregarded by Goodman.

In sum, Mr. Goodman proceeded at his own peril and risk to broadcast the fake hoax threat to the 7<sup>th</sup> District Unified Command (**Incident B**) based on vague and ambiguous knowledge of a mystery man known as “Deep Uranium”.

The source of this dirty bomb “intelligence” (“Deep Uranium”) is a former FBI informant. It is very telling that a few weeks after the 6/14/2017 Port of Charleston incident, Mr. Goodman inaugurated a special CSTT exclusive weekly feature known as the **Hudson Report** featuring “Deep Uranium” on August 14, 2017.



Screen capture of The Hudson Report

### *The Curious Deep Uranium, aka Rock Hudson of The Hudson Report*

The identity of the curious “Deep Uranium” appears to be that of a former FBI informant living in West Virginia.



The likely individual known as Deep Uranium and Rock Hudson on CSTT<sup>8</sup>

<sup>8</sup> <https://www.youtube.com/watch?v=zp5Z-NC8ils>

## **Militia leader guilty in bomb plot**

Aug. 8, 1997

WHEELING, W.Va. -- The self-proclaimed general of West Virginia's Mountaineer Militia has been convicted of plotting to blow up the FBI's fingerprint laboratory. A U.S. District Court jury found Floyd 'Ray' Looker, a Vietnam veteran who lives in Stonewood, W.Va. and claims to be a gospel preacher, guilty of conspiracy to engage in manufacturing and dealing in explosives without a license.

The 56-year-old Looker, who testified in his own behalf Thursday, had told jurors he didn't know it was illegal to build bombs. He said he wanted to stockpile explosives in case the United States were invaded by a foreign force. The government, however, said Looker planned to use the explosives to blow up the FBI's fingerprint lab in Clarksville, W.Va., about 90 miles south of Pittsburgh. Looker was arrested Oct. 11, 1995 after he allegedly sold blueprints of the FBI fingerprint complex for \$50,000 to an undercover agent who claimed to represent a terrorist group. The prosecution's case was based information received from a former militia member who has since entered the government's witness protection program. The informant, **Okey**

**Marshall Richards Jr.**, made more than 400 tape recordings that led to the arrest of Richards. Defense attorneys called Richards' two ex-wives who told the court the informant is a pathological liar. The two women also said he owed them at least \$40,000 in alimony and child support. Looker's co-defendants, Jack Arland Phillips and Edward F. Moore, both entered guilty pleas at earlier hearings.

The Hudson Report was marketed by CSTT as an "intelligence report", including a synopsis of leaked law-enforcement and/or intelligence community information. The focus of The Hudson Report was to create drama and interest based on upcoming events related to "intelligence assessments".

This was a regular feature of CSTT; the showcasing of the same individual who was the alleged source of the "dirty bomb" threat information.

**PART III:  
SUFFICIENCY OF  
LEGAL REMEDIES**

*Presumed Violations of Federal law*

**18 U.S.C. § 1030, COMPUTER FRAUD AND ABUSE ACT**

18 U.S.C. § 1038 states:

- (5)
  - (A) knowingly causes the transmission of a program, information, code, or command, and as a result of such conduct, intentionally causes damage without authorization, to a protected computer;

In 2011, the Sixth Circuit Court of Appeals addressed similar DDOS-style attacks in *Pulte Homes, Inc. v. Laborers' Intern. Union of North America*, 648 F.3d 295 (6th Cir. 2011).

This case that did not deal directly with a per se **DDoS** attack but did deal with a labor union's concerted email and telephone "attack" on a company of such a volume that it disrupted the company's ability to do business<sup>9</sup>.

The issue before the court in *Pulte* was whether the labor union "intentionally caused damage" by causing e-mail bombs and needless phone calls to a business. The Pulte Court, in finding a violation of the Computer Fraud and Abuse Act and, consequentially, "damage" arising from this activity, held that "a transmission that weakens a sound computer system—or, similarly, one that diminishes a plaintiff's ability to use data or a system" causes damage. *Id.* at 301. The court reasoned:

Under the **CFAA**, "any impairment to the integrity or availability of data, a program, a system, or information" qualifies as "damage." Because the statute includes no definition of three key terms—"impairment," "integrity," and "availability"—we look to the ordinary meaning of these words. "Impairment" means a "deterioration" or an "injurious lessening or weakening." The definition of "integrity" includes an "uncorrupted condition," an "original perfect state," and "soundness." And "availability" is the "capability of being employed or made use of." Applying these ordinary usages, we conclude that a transmission that weakens a sound computer system—or, similarly, one that diminishes a Plaintiff's ability to use data or a system—causes damage."

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<sup>9</sup> <https://shawnetuma.com/2013/10/09/yes-case-law-says-it-really-is-a-cfaa-violation-to-ddos-a-website/>



**18 U.S.C. § 1038, TERRORIST HOAX IMPROVEMENTS ACT OF 2007**

18 U.S.C. § 1038 states:

**(a) Criminal Violation.—**

**(1) In general.**-Whoever engages in any conduct with intent to convey false or misleading information under circumstances where such information may reasonably be believed and where such information indicates that an activity has taken, is taking, or will take place that would constitute a violation of [specified anti-terrorism laws,] shall [be fined or imprisoned as provided].

In 2017, a 21 y.o. volunteer fire fighter in Columbia, S.C. was sentenced to one year of imprisonment and three years of supervised probation for phone texting three unknown people that he had heard that someone placed a bomb at a Veteran's Administration Medical Center<sup>1</sup>.

As suggested in *United States v. Jewell*, 532 F.2d 697 (9th Cir. 1976), Mr. Goodman's willful blindness to the sources of the 6/14/2017 dirty bomb warnings (calculated to cause panic and disrupt the civil peace) does not provide an adequate defense.

To address the intent requirement of 18 U.S.C. 1038 it is instructive to note the wisdom of *United States v. Castagana*, 604 F.3d 1160, 1164 (9th Cir. 2010).

*Whether the circumstances were such that Castagana's victims or other observers may reasonably have believed his statements to indicate terrorist activity is a question wholly independent of Castagana's intentions. That is precisely what a reasonableness standard, triggered by factual circumstances, means. The insertion of this reasonableness requirement removes from consideration the subjectivity of the actor's intent and replaces it with an objective standard.*

The intention of Mr. Goodman is not an issue. The willful blindness on Goodman's part to seize on "intelligence" information from a former FBI informant to create a Twitter Storm is the issue.



**PART IV:  
BURGEONING CAPABILITIES  
OF  
CSTT THREAT ACTORS**

### *Weaponization of Attack Bots by CSTT Affiliates*

Cognitive (mind) threats are a type of social engineering attack that demands immediate action based on a perceived crisis (always based on deception). For such attacks to work there must be an appearance of legitimacy ("intelligence source"). E-mail phishing attacks are an example of deception based social engineering designed for an illegitimate call to action.

These attacks (like **Incident B**) can overwhelm public safety responders in an instant, sewing confusion which blurs proper situational awareness and threat assessment.

The speed of the Internet, the large audience reach of social media platforms, and the opportunity to fashion hoax events create attacks that are largely unknown and unfamiliar to public safety responders.

Deception coupled with "auto bot" or "bot" technology is even more troubling. The same CSTT group responsible for Charleston is perfecting a type of "doomsday" auto-bot messaging system with the end objective to "reset the machine".

These CSTT affiliates (emboldened by the lack of a legal threat) are openly communicating via YouTube and Twitter to create a Project Mayhem type of doomsday network. This is a recipe for a larger scale hoax in the future.

The auto-bot network can (labeled #TimePhoneHack) disseminate massive disinformation via social media networks to create panic in seconds. The same CSTT threat actors involved Charleston are now using sophisticated Artificial Intelligence (AI) techniques to perfect their methods (in plain view).

### Time Phone Hack #tyler #teamtyler - YouTube



<https://www.youtube.com/watch?v=Q5B6OZInPTU>

1 day ago · Uploaded by Quinn Michaels

Developing artificial intelligence with a unique perspective. Quinn Michaels is working on indra as an artificial

### Time Phone Hack #Tyler #TeamTyler - YouTube



<https://www.youtube.com/watch?v=3jy8xc02aH6>

1 day ago · Uploaded by Quinn Michaels

Developing artificial intelligence with a Unique perspective. Quinn Michaels is working on indra as an artificial

### Time Phone Hack How To Hack Time - YouTube



<https://www.youtube.com/watch?v=n4e481IAsbo>

1 day ago · Uploaded by Quinn Michaels

Developing artificial intelligence with a unique perspective. Quinn Michaels is working on indra as an artificial

### Time Phone Hack And Were Back - YouTube



[https://www.youtube.com/watch?v=LvSi7-ab\\_\\_Sk](https://www.youtube.com/watch?v=LvSi7-ab__Sk)

1 day ago · Uploaded by Quinn Michaels

Developing artificial intelligence with a unique perspective. Quinn Michaels is working on indra as an artificial

### Time Phone Hack More Entertaining - YouTube



<https://www.youtube.com/watch?v=ZNvU56T6Ktk>

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Developing artificial intelligence with a unique perspective. Quinn Michaels is working on indra as an artificial

### *Attack Tools Border on Cyber Warfare*

Cognitive attacks (weaponized deception) coupled with technology devices (auto-bots) have created a new style of cyber threat known as blended attacks. Such attacks are multi-layered and can avoid traditional pre-attack indicators. Techniques such as these are bordering on the domain of cyber warfare.

The sophistication of this style of attack will remain perplexing to traditional first responder resources (as with Charleston). As this paper is being written, a bot-net style attack apparently launched by CSTT is presently underway.

The CSTT affiliate known as "Quinn Michaels" is presently openly recruiting followers to launch cyber-based attacks in the perceived enemies and rivals of CSTT. Michaels, who claims to understand the Palantir<sup>10</sup> intelligence algorithms, is engineering an Artificial Intelligence (A.I.)-based bot network to monitor social media for trigger words and respond with replies to guide and enhance a cognitive attack.

These attacks indicate that the CSTT confederation have not been deterred by the closure of the Port of Charleston and the downstream consequences of that event. In fact, the opposite is true – they have become embolden by the lack of legal accountability.

This type of threat to critical infrastructure has yet to be addressed firmly with legal action. Thus, a deterrence capability is lacking. Without effective deterrence, others (motivated by profit, philosophy, ideologies, etc.) will stage similar hoaxes.

Meanwhile, the lack of criminal prosecution of these threat actors has created a fertile environment for testing and prototyping hoax enhancing auto-bots.

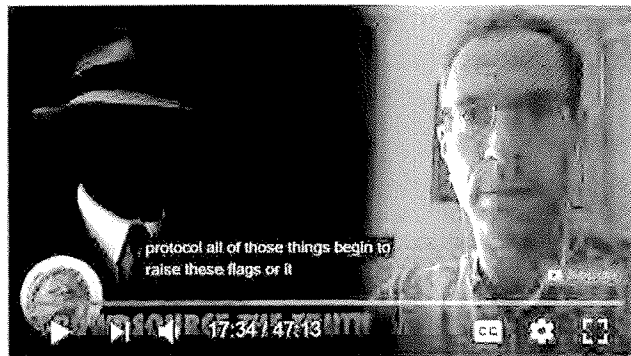
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<sup>10</sup> <https://www.bloomberg.com/features/2018-palantir-peter-thiel/>

## **ANNEX**

24

“Rock Hudson” discusses the Port of Charleston in an August 14, 2017 video<sup>11</sup>.



Hudson Revealed



Jason Goodman



19,801 views



Published on Aug 14, 2017

*“In regards to **George Webb** I have a tremendous respect for Webb and I don’t mind telling you –*

*and that is that **George is just an amazing** – that you what a mind -- yeah – what a mind – I can’t speak enough of it, I mean it’s just ....*

*You take for example intelligence and people say well how do we know this guy [Hudson] is telling us the truth – well okay ...*

*We know, we know for a fact that **425 million cargo containers** are transported each year in the world that represents over 90 percent of the world’s total trade ...*

***Charleston South Carolina is a port hub** – those hubs – depending on the security protocols that their using – that day or that shift – they can process 1,500 to **50 thousand** containers per day. That raised an eyebrow with me...*

*But, don’t worry because they really do care about you ...*

***They should be ashamed of themselves ...**” Beginning at 39:20 in the YouTube video “Hudson Revealed” published August 14, 2017.*

<sup>11</sup> <https://www.youtube.com/watch?v=TWUI8gDPFx0&t=2021s>



Goodman provides recap of the dirty bomb hoax at 1:33, names Joe Napoli at 3:13, continues on to 8:51



Unrig Cynthia McKinney



Jason Goodman

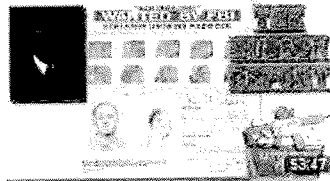
Subscribe

11 504 views

[https://www.youtube.com/watch?v=tSI0ZflsN\\_k](https://www.youtube.com/watch?v=tSI0ZflsN_k)

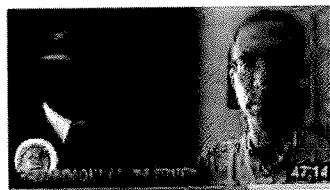


**Example of the weekly “The Hudson Report” YouTube shows**



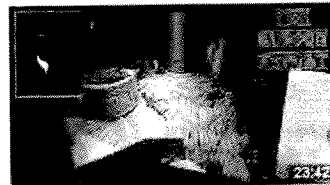
**Hudson Report - Benjamin Paddock & Battlefield Las Vegas**

Jason Goodman  
5 months ago • 12,870 views  
Become a sponsor of Crowdsource the Truth and support the effort  
<https://paycom.faircrowdsourcethetruth.com> <https://www.patreon.com>



**Hudson Revealed**

Jason Goodman  
6 months ago • 13,781 views  
With over 40 years of military, intelligence and clandestine experience  
confidential Crowdsorce operative codename HUDSON.



**The Hudson Report - Multiple Shooters in Las Vegas?**

Jason Goodman  
6 months ago • 12,931 views  
Mr Hudson provides his analysis that indicates multiple shooters, multiple  
rates of fire and multiple caliber weapons. Become a



**Hudson Report Awan Bros IT Scandal Hearing**

Jason Goodman  
6 months ago • 12,410 views  
Mr Hudson returns after being off grid for several days on a return mission  
he weighs in on the Awan Bros IT scandal. Tom Fitch's



**Hudson Report - Criminal Congress**

Jason Goodman  
6 months ago • 1,182 views  
Mr Hudson puts some names to new and more infamous crimes  
choosing as he formulates a stunning historical story.

<sup>1</sup> <https://www.justice.gov/usao-sc/pr/columbia-man-sentenced-making-hoax-bomb-threat>



71911657R00018

Made in the USA  
Middletown, DE  
01 May 2018

The next generation of cyber warfare attack tools will be based upon Artificial Intelligence. A.I. tools can execute complex social media attacks to create panic. Law enforcement is falling further behind the tip of the spear in comprehending the cyber warfare nature of these attack techniques.

This booklet describes how social media hoax news sites can attack America's critical infrastructure. Seemingly, these deception merchants operate with no threat of legal action. This fertile environment has allowed the consequence-free attacks on maritime ports, generation of hysteria of supposed assassination plots, etc.

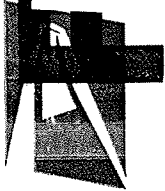
The alleged deception merchant described herein is Jason David Goodman of New York City, operator of the "business" CrowdSourceTheTruth (a social media conspiracy channel).

**WARNING:** No individuals described herein should be presumed to be guilty of any particular violation of law, policy or regulation. All parties should be presumed innocent until a competent court deems otherwise.



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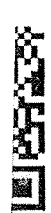
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